



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

Ordered by policy number I-SP3

January 2026

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0330005	Organisation	Michael	Murrell	Basildon Council		IDP	No	Whilst the Infrastructure Delivery Plan (IDP 2025) produced by DAC Planning concludes that there are no significant issues or concern identified which could have an impact on the strategy of the emerging Castle Point Plan, the methodology was based on three growth scenarios previously identified in the Regulation 18 draft plan. It is understood	Not Stated	Not stated						B - confirm for formal response	Considers that the IDP needs to be updated to include the amended housing strategy in the Reg 19 plan which included the additional growth proposals at Canvey Island	Additional work has been undertaken to the IDP to reflect the additional growth proposals at Canvey Island.	N

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								od that an addendum will be carried out to provide an update to the document, Basildon Council considers it essential that Castle Point update the IDP accordingly to take full account of the urban renewal and regeneration approach proposed in the Regulation 19 Plan. Therefore, it is vital that the IDP is updated to ensure											

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								that sufficient provision for the delivery of new infrastructure is made to support the proposed level of growth.											
00570002	Organisation	James	Lawson	Essex Police	Yes	IDP	Yes	5. Essex Police submitted evidence to inform the Borough's housing growth infrastructure scoping process - at the stakeholder consultation stage of the Castle Point Infrastructure Delivery Plan (IDP) in February 2025.	Yes				Not Stated		Yes, Neighbourhood Police Update	A	EP is satisfied that that sufficient recognition for developer funded police infrastructure/ facilities is now included within the IDP. EP welcomes the approach and raises no 'soundness objections' to the Infrastructure Delivery Plan Infrastructure Assessment (IDP evidence base) as currently drafted. Finally, Annex 1 and Annex 2 below, provide a number of clarifications to update the EP evidence base, along with minor	Comments noted	N

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								6. EP's evidence assessed the increased demand arising on its service capacity from planned housing and population growth, and set out the scope and level of developer funded infrastructure/facilities required to mitigate and manage the impacts from housing/population growth. 7. EP is satisfied that that sufficient									changes to assist with the update of the IDP.		

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								<p>t recognition for developer funded police infrastructure/ facilities is now included within the IDP.</p> <p>8. EP welcomes the approach and raises no 'soundness objections' to the Infrastructure Delivery Plan Infrastructure Assessment (IDP evidence base) as currently drafted.</p> <p>9. Finally, Annex 1 and Annex 2 below, provide a number</p>											

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								of clarifications to update the EP evidence base, along with minor changes to assist with the update of the IDP.											
0823-0014	Organisation	Pat	Abbot	Environment Agency	Yes	INFR A1	Yes		Yes		The Local Plan and Policy Infra1 on Community Provision does not appear to include the provision of cemetery and burial space. We recommend the following guidance be referenced: Guidance for Cemeteries and burials; Protecting groundwater from human burials; and The Environment Agency's Approach to Groundwater Protection, section L. Our guidance is regularly revised, and therefore applicants should be advised to contact us to ensure that they are using the current version.	The Local Plan and Policy Infra1 on Community Provision does not appear to include the provision of cemetery and burial space. We recommend the following guidance be referenced: Guidance for Cemeteries and burials; Protecting groundwater from human burials; and The Environment Agency's Approach to Groundwater Protection, section L. Our guidance is regularly revised, and therefore applicants should be	No	Not Answered		A	Concerned that the policy does not reference the provision of cemetery and burial space. We recommend the following guidance be referenced: Guidance for Cemeteries and burials; Protecting groundwater from human burials; and The Environment Agency's Approach to Groundwater Protection, section L. Our guidance is regularly revised, and therefore applicants should be advised to contact us to	Comments noted, see modifications proposed.	19.13 For the purposes of this Policy, community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities,

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												advised to contact us to ensure that they are using the current version.					ensure that they are using the current version.		education facilities, libraries, community halls, criminal justice facilities meeting rooms, places of worship, cemeteries and burial grounds , public toilets, pubs and post offices. New paragraph after 19.15 For development proposals relating to cemeteries and burial grounds, there should be regard to the guidance for Cemeteries and burials; Protecting groundwater from human

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																			burials and The Environment Agency's Approach to Groundwater Protection."
02820041	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra1	Not Stated		No	Effective	ECC seek criteria 3 d is amended to refer to access to adequate cycling and walking links as well as public transport provision. ECC seek amendments to Criteria 5 to provide clarification that education (a nursery) is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2. ECC seek amendment to paragraph 19.7 to provide clarification that education is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with	ECC require Criteria 3 d is amended to read: Be located in a sustainable location, with access to adequate public transport provision, cycling and walking links; ECC require Criteria 5 is amended to read: In relation to the loss of a locally valued community facility that is commercial in nature, such as a public houses or , private healthcare facility , evidence will need to be submitted to demonstrate that the use is not economically viable and that it is no longer required to meet the needs of the	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	ECC seek criteria 3 "d" is amended to refer to access to adequate cycling and walking links as well as public transport provision. Recommends that nursery provision is not defined as being community use and thereby subject to Policy Infra1. Education should not be defined as community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and change of use only permitted if ECC and other educational	Accepted and amendment made. CPBC agree early years provision should not be lost to development unless there are other providers within the area to pick up the surplus. Please refer to the SOCG to clarify that libraries should be included within 'community' use rather than education, as stated in the Reg 19 response.. CPBC considers that all the services listed within this policy are important including educational services. Additional text has been provided to accommodate EEC requests. Please refer to the SOCG to clarify that libraries should be included within 'community' use rather than	3d. Be located in a sustainable location, with access to adequate and within walking distance of public transport provision, cycling and walking links; 5. In relation to the loss of a locally valued community facility that is commercial in nature, such as a public houses, private healthcare facility or a nursery, evidence will need to be

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											<p>Policy Infra2. ECC seek amendment to paragraph 19.13 to provide clarification that education is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2. 3. Effective ECC welcome reference in Criteria 3c and paragraph 19.10 regarding the need for accessibility of community facilities to be designed to enable accessibility for all regardless of disability, including those with care and support needs who may live in general housing and participate in wider community life. However, paragraph 19.10 does not set out how infrastructure to support SSH will be delivered, as raised in ECC's Regulation 18 response. These forms of housing require integrated infrastructure to ensure operational viability and support independence, including:</p> <ul style="list-style-type: none"> • Access to health and care services (referenced in the Infrastructure Delivery Plan, Section 11.3(g)). • Community facilities suitable for people with care and support needs (Policy 	<p>local community. ECC require paragraph 19.7 is amended to delete reference to schools as community uses to read:</p> <p>Many of the community halls and GP surgery buildings within the Borough are ageing and have issues accommodating the services required. ECC require the definition of community uses in paragraph 19.13 is amended to read:</p> <p>For the purposes of this Policy, community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, community halls,</p>					<p>providers identify as being surplus to educational requirements. Considers that education facilities and libraries are removed from the definition of community use in INFRA1 The delivery of Infrastructure to support Specialist and Supported Housing will need to be considered</p>	<p>education, as stated in the Reg 19 response CPBC has included reference to Specialist and Support Housing within its Infrastructure Delivery Plan and Policy Hou4. New development which provides Specialist and Supported Housing will have to consider within their design the necessary infrastructure needs to support them and provide evidence of this within their planning applications</p>	<p>submitted to demonstrate that the use is not economically viable and that it is no longer required to meet the needs of the local community . This should include demonstrable evidence that the facility had been placed on the open market for a period of at least one year at the standard market rate, without success.</p>

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											<p>Infra3 – Improving Health and Wellbeing)</p> <ul style="list-style-type: none"> • Transport and mobility infrastructure (NPPF paragraph 117b) • Digital connectivity for care-enabled technology (ECC Market Position Statement, 2023) 	<p>criminal justice facilities meeting rooms, places of worship, public toilets, pubs and post offices. ECC recommends paragraph 19.10 is amended to include reference to infrastructure required to support Supported and Specialist Housing (SSH), including:</p> <ul style="list-style-type: none"> • Care-ready community facilities • Accessible transport and mobility infrastructure • Digital connectivity to support care-enabled technology <p>ECC recommends that the Infrastructure Delivery Plan (IDP) includes specific reference to SSH-related infrastructure needs.</p>										
02820042	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra1	Not Stated		Yes		ECC welcomes the reference to community halls and health centres within community facilities in paragraph 19.13 as they help contribute to healthy and inclusive communities. These facilities should be designed		Yes	Not Stated	Yes, ECC supplied 8 additional appendices	B	Welcomes reference to community halls and health centres are included in community facilities and any	Accepted no modification	Community facilities represent a considerable stock of brownfield land supply in the			

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											inclusively to ensure they are accessible and usable by all people, regardless of age, need, or disability. This is important not only for those living in Specialist and Supported Housing (SSH) but also for people with support needs living in general housing and participating in wider community life. This aligns with ECC's Extra Care Design Guide (2023) and Supported Living Accommodation Standards.				containing various pieces of evidence		development which includes new community facilities should be designed to be accessible by all people regardless of age, need or disability.		Borough. Many of these schools, community halls and GP surgery community buildings within the Borough are ageing and have issues accommodating the services required.... Therefore, community buildings should be designed to allow for disabled access and should be located in order to provide the opportunity for as many people as possible to access the facility by foot and/or by public transport. Planning applications should provide details of how accessibility has been

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																			considered within the design of the development. education facilities
07320002	Individual	Rachael	Wratislaw		Yes	INFR A1	Yes		No	Positively prepared	There is no mention of relocating the library. Libraries are still important as they allow for equal access to knowledge (not just books but internet access), are community hubs for people of all ages and host things like Storytime's for children, reading groups, workshops and other cultural activities, support literacy and education (summer reading challenges), cultural preservation of the local area, and also provide economic and social value.	There needs to be a guaranteed space for a Hadleigh library in the new development or relocation nearby; so that people can still access it by bus or car parking or by foot.	No	Not Answered		A	Relocation of Hadleigh Library is necessary	Policy INFRA1 is included within the plan to make sure that the redevelopment of existing community facilities are only supported if a replacement/improvement to existing facilities are provided.	N
03530003	Organisation	Hyacinth	Cabiles	NHS Property		Infra1		Draft Policy Infra1 focuses on the provision of new and improvement of existing community facilities . Point 4 in particular sets out the requirements to be								A	Draft Policy Infra1 focuses on the provision of new and improvement of existing community facilities. Point 4 in particular sets out the requirements to be demonstrated where the development would result in the loss of a community facility. NHSPS welcomes the included wording under	Policy element 4 states that 'a. An assessment has been undertaken which demonstrates that the existing facility is surplus to requirement;' would justify the loss of a facility. <u>New paragraph 19.13</u> The loss of any community facilities must be fully justified. The Local Planning Authority will require any	Y

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								demonstrated where the development would result in the loss of a community facility. NHSPS welcomes the included wording under Point 4 (a), in line with our previous representation at early Regulation 18 stage (2024). For the avoidance of doubt in the interpretation of Policy Infra1 Point 4, we would request the Council to									Point 4 (a), in line with our previous representation at early Regulation 18 stage (2024). For the avoidance of doubt in the interpretation of Policy Infra1 Point 4, we would request the Council to provide clarity in supporting paragraphs in reference to the disposal process of healthcare facilities. Where healthcare facilities are demonstrated as being surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, we request that it is clarified and ensured that this will sufficiently satisfy the requirements under Point 4 (a) of the policy	application involving the loss of a facility to be supported by written evidence and applicants should contact the Local Planning Authority at the earliest stage to discuss the details.	

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								provide clarity in supporting paragraphs in reference to the disposal process of healthcare facilities . Where healthcare facilities are demonstrated as being surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, we request that it is clarified and ensured that this will											

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								sufficiently satisfy the requirements under Point 4 (a) of the policy.											
0937-0011	Individual	Jonathan	Pinnock		Yes	Infra1	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA1	Support noted.	N
0282-0043	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra2	Not Stated		No	Effective, justified	ECC seek amendments to ensure that Policy Infra1 - Community Facilities and Policy Infra2 – Education, Skills and Learning relate to the relevant uses, which at present is unclear due to definitions in the Glossary and Reasoned Justification. ECC support criteria 1 which states that the change or use or redevelopment of educational establishments will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements. However, ECC recommends sites of educational use are identified on the Policies Map to help implement this policy. ECC seek amendments to ensure that Policy Infra1 - Community Facilities and Policy Infra2 – Education, Skills and Learning	ECC require Criteria 1 is amended to read: The change or use or redevelopment of educational establishments identified on the Policies Map will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements. ECC require paragraph 19.17 is amended to read: `....colleges, libraries, youth facilities,	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Request that educational establishments are not included in INFRA1 which refers to community uses and that educational establishments are identified on the policy map and reference made to this in criteria 1. Proposes the removal of “youth facilities” from the definition for Education facilities. A cumulative assessment is required with respect to primary, secondary, early	Amendments have been made to the text to distinguish educational uses from community uses between INFRA1 and INFRA2 CPBC agrees to identifying sites of educational use on the policies map. Accepted Youth facilities removed from definition Please refer to the SOCG to clarify that libraries should be included within `community’ use rather than education, as stated in the Reg 19 response. CPBC will work with ECC to undertake a further assessment to identify the	1. The change or use or redevelopment of educational establishments, identified on the Policies Map, will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements. 4.The

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											<p>relate to the relevant uses, which at present is unclear due to definitions in the Glossary and Reasoned Justification.</p> <p>ECC consider paragraph 19.17 defines education uses subject to the deletion of 'youth facilities', which is included in the Glossary definition of Community Uses.</p> <p>Paragraph 19.20 refers to the Infrastructure Delivery Plan establishing where new educational facilities are required based on the growth identified within the Plan.</p> <p>However, CPBC has not requested or provided the relevant information for ECC to undertake the required cumulative assessment of the growth in the Plan consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (February 2025). Consequently, the references in paragraph 19.25 regarding early years requirements and paragraphs 19.27 – 30 (primary, secondary and SEND) will need to be subject to a cumulative assessment of the scale and distribution of growth set out in this Plan.</p> <p>Prior to submission of the Plan, the IDP will require a significant update to fully reflect the evidence base</p>	<p>employment and skills measures and other community learning spaces'. Please refer to the detailed response with regards the Infrastructure Delivery Plan.</p> <p>ECC require an additional Criteria be added to the policy to read:</p> <p>The Council will seek to improve local skills and access to employment opportunities through Employment and Skills Plans.</p>				<p>years education and childcare and SEND provision based on the scale and distribution of the Plan prior to submission of the Plan. This would feed into an updated Infrastructure Delivery Plan. Welcomes reference to the preparation of Employment Skills Plans and for growth to improve local skills and access to employment skills and employment through Employment Skills Plans.</p>	<p>necessary primary, secondary, early years education and childcare and SEND provision for the submission Plan and the IDP and Site Policies will be updated according to the results of that assessment. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. Accepted and additional criteria added to emphasise the Council's commitment to improve employment and skills in the borough.</p>	<p>Council will seek to improve local skills and access to employment opportunities through Employment and Skills Plans.</p>	

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											<p>referenced in the Plan, as a significant amount has been undertaken since the latest IDP. ECC will need to undertake a cumulative assessment of the growth for education and early years and childcare and assist to identify the necessary highway and transportation interventions necessary. ECC welcomes reference to Employment and Skills Plans (ESP) in paragraphs 19.35 and 19.36 but reference should be made within the policy to provide them with more weight through the planning application process.</p> <p>ECC, via the ECC Developers Guide to Infrastructure Contributions (2025), requires all strategic scale planning applications of 50 or more homes or employment space providing 2,500sqm (GIA) or more floorspace, to enter into an Employment and Skills Plan to provide employment and skills opportunities to benefit the local community. An ESP must:</p> <ul style="list-style-type: none"> • include apprenticeships, work experience, volunteering, careers information and training; • must be shared with and agreed by the LPA and ECC ahead of the S106 agreement being signed off; • include options such as the direct delivery or skills and employability programmes, school / college engagement and work experience 													

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											opportunities, or construction or workplace apprenticeship schemes for local residents; <ul style="list-style-type: none"> • be secured through S106 agreements; and • cover the Council's costs associated with the monitoring of the plans, with reports provided to the Council by developers for inclusion in the Authority Monitoring Report. 									
02820044	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra2	Not Stated		Yes		ECC support reference in Criteria 2 where a development proposal, either individually or cumulatively, increases demand for education facilities beyond those available within the local area, development will be required to provide land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities. Reference to development providing land for a new		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Development proposals which increase demand for education facilities beyond those available within the local area should contribute to expansion or alteration of the facility to provide for the additional demand	Accepted no modifications Policy SP4, Criteria 2 has been amended to make reference to where necessary, developers being required to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development acceptable in	For the purpose of this policy, education facilities include, but are not limited to early years and childcare (full day care, pre-schools, child minders, school run early years provision, and 'wrap	

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											educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities should also be referenced in Policy SP4 – see earlier response.							planning terms providing consistency with this policy	around care’ – breakfast, after school and holiday clubs), schools (primary, secondary and Post 16 Education), Special Education Needs and Disabilities (SEND), colleges, libraries, youth facilities, employment and skills measures and other community learning spaces
0937-0012	Individual	Jonathan	Pinnock		Yes	Infra2	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA2	Support noted.	N
0282-0045	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra3	Not Stated		No	Effective	ECC welcome and support Policy Infra3 which aims to support to improve the health and wellbeing of residents through partnership working with Health Stakeholders and Public Health.	ECC require paragraph 19.44 is amended to read: More broadly, the Council will work with the NHS, Public Health and	Yes	Not Stated	Yes, ECC supplied 8 additional appendices contain	B	Welcomes reference to the preparation of Employment Skills Plans and for growth to improve local skills and access to	Accepted and additional criteria added to emphasise the Council’s commitment to improve employment and	More broadly, the Council will work with the NHS, Public Health and other

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											ECC recommend paragraph 19.44 is amended to reference the local Castle Point and Rochford Health and Wellbeing Strategy	other partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issues and priorities emerging through the Joint Strategic Needs Assessment (JSNA), the Essex Joint Health and Wellbeing Strategy and the Castle Point and Rochford Health and Wellbeing Strategy.			ning various pieces of evidence		employment skills and employment through Employment Skills Plans. Typo	skills in the borough. Accepted	partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issues and priorities emerging through the Joint Strategic Needs Assessment (JSNA), and the Essex Joint Health and Wellbeing Strategy and the Castle Point and Rochford Health and Wellbeing Strategy. This will not only involve
02820046	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra3	Not Stated		Yes			ECC require the following typo in paragraph 19.50 is amended to read: The Essex Healthy Places document is an advice note on	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing	B	Typo	Accepted.	The Essex Healthy Places Document is an advice note on how planners, developers and

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												how planners, developers...			various pieces of evidence				designers can incorporate health into proposals and the key attributes in creating healthy places.
03360015	Organisation	Caroline	Peters	Essex Police		Infra3	Not Stated	Constructing well designed developments, buildings and places that promote both sustainable communities and health and wellbeing is an objective that Essex Police widely supports . Mitigating the opportunities for crime is not only about reducing and								A	Support for INFRA3.	Support noted	N

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								preventing injury and crime, but it is also about building strong, healthy, cohesive, accessible, vibrant, and participatory communities. 'The relationship between an area's health and crime levels is complex. On one hand, living in areas with high levels of crime can affect people's health negatively. In addition to the direct											

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								health effects of being the victim of violent crime, fear of crime can also have an indirect detrimental impact on health. Research shows that fear of crime results in people exercising less, as well as reducing how often people socialise, resulting in poorer mental and physical health.'											

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0338-0003	Organisation	Catherine	Bicknell	NHS Mid and South Essex		Infra3		Policy Infra3 – Improving Health and Wellbeing says that the Council will work in partnership with the NHS and Public Health to ensure residents can access high quality primary and secondary health care services and that new and improved services are put in place, where appropriate, to serve the growing population; and • Policy Inf3 does not								A	<p>The ICB requested that the Plan, in addition to new development creating healthy environments and associated infrastructure, is drafted to help improve health in existing areas and reduce health inequalities that exist in the district.</p> <p>The Council's Issues and Options Consultation Statement 2025 explains that:</p> <ul style="list-style-type: none"> • Policy Infra3 – Improving Health and Wellbeing says that the Council will work in partnership with the NHS and Public Health to ensure residents can access high quality primary and secondary health care services and that new and improved services are put in place, where appropriate, to serve the growing 	<p>Support noted.</p> <p>Health factors and presence of health-care services is monitored as part of the Plan Monitoring Framework.</p> <p>Similarly, open space, recreation and highway safety all form part of the background evidence supporting the plan-making process. This evidence has been used to inform policies and to improve performance in these areas as appropriate.</p>	N

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								explain specifically what action will be taken to achieve the points set out in the policy, but the supporting text gives more detail. It explains that the Council will: <ul style="list-style-type: none"> Secure developer contributions towards new healthcare space with the NHS determining how new provision should be provided Work with partners in the 										population; and Policy Inf3 does not explain specifically what action will be taken to achieve the points set out in the policy, but the supporting text gives more detail. It explains that the Council will: <ul style="list-style-type: none"> Secure developer contributions towards new healthcare space with the NHS determining how new provision should be provided. Work with partners in the NHS to retain and continue to extend outreach services from the hospitals in the local area. Work with partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issue and 		

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								NHS to retain and continue to extend outreach services from the hospitals in the local area. <ul style="list-style-type: none"> Work with partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issue and priorities emerging through the Joint Strategic Needs Assessment (JSNA) and the 									priorities emerging through the Joint Strategic Needs Assessment (JSNA) and the Essex Joint Health and Wellbeing Strategy. The text explains that this will involve improvements to housing and to the environment, such as accessibility standards in new homes, improving active design, improving the quality of open spaces and making roads safer for walking and cycling. Taken together the Canvey place policies seek to deliver new housing, deliver improvements to the town centre environment guided by a master planning process, maintain and improve open spaces and public realm, and enhance accessibility to		

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								Essex Joint Health and Wellbeing Strategy. The text explains that this will involve improvements to housing and to the environment, such as accessibility standards in new homes, improving active design, improving the quality of open spaces and making roads safer for walking and cycling.									and around the island. Similar policies are proposed for other places in the district. The ICB supports the inclusion of these policies and requests that their effectiveness in improving health in existing areas and reducing health inequalities that exist in the district is monitored and opportunities are taken to amend policies to improve performance in these areas as appropriate.		
0353-00	Organisation	Hyacinth	Cabiles	NHS Property		Infra3		Draft Policy Infra3 sets out the Council's								A	Draft Policy Infra3 sets out the Council's commitment to making sure that new developments	Support noted	N

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02								commitment to making sure that new developments consider their impacts on health and wellbeing. NHSPS welcomes and supports the inclusion of policies which seeks to improve health and wellbeing, and the requirement for Health Impact Assessment on significant residential developments of 50 units or more. There is a well-									consider their impacts on health and wellbeing. NHSPS welcomes and supports the inclusion of policies which seeks to improve health and wellbeing, and the requirement for Health Impact Assessment on significant residential developments of 50 units or more. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.		

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								established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determin											

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								ants of health.											
0937-0013	Individual	Jonathan	Pinnock		Yes	Infra3	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA3	Support noted.	N
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	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: <ul style="list-style-type: none"> '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. On a selection of national well-being criteria such as happiness and life satisfaction, an average 	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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								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			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.									

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								als. 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 many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists,											

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								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.											
0738-0010	Organisation	Roy	Warren	Sport England	Yes	INFR A3	Yes		No	Positively prepared, Consistent with national policy	In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that the policy does not go beyond the focus on providing conventional health infrastructure and also cover preventative health measures. In particular, a health and wellbeing policy in a Local Plan would be expected to require developments to be planned and designed to support physical activity and thereby encourage healthy lifestyles. As well as positively	To address this, it is requested that an additional requirement is included in Policy Infra3 along the following lines: "Expecting developments to be planned and designed to encourage more active and healthier lifestyles" It is also requested that the reasoned	No	Not Answered		A	In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that the policy does not go beyond the focus on providing conventional health	See modifications proposed	Modification to Policy Infra3 (to be inserted as f. and subsequently renumbering) f. Expecting all development proposals to be planned and designed to

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											<p>responding to the Local Plan's vision and objectives, the inclusion of an additional requirement to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF.</p> <p>An objection is therefore made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness.</p>	<p>justification then provides a short explanation of the importance of planning and designing developments to encourage more active and healthier lifestyles. Sport England's Active Design guidance can be signposted to for detailed advice on how this can be achieved in practice.</p>					<p>infrastructure and also cover preventative health measures. In particular, a health and wellbeing policy in a Local Plan would be expected to require developments to be planned and designed to support physical activity and thereby encourage healthy lifestyles. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional requirement to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF.</p> <p>An objection is therefore made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy'</p>		<p>encourage more active and healthier lifestyles; New paragraph to be added to Reasoned Justification after 19.50 Designing developments to promote active and healthier lifestyles is central to creating sustainable communities. Incorporating walking, cycling, green spaces, and accessible sports facilities encourages daily activity, supports wellbeing, and reduces car dependency. Development</p>

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																	tests of soundness.To address this, it is requested that an additional requirement is included in Policy Infra3 along the following lines: “Expecting developments to be planned and designed to encourage more active and healthier lifestyles” It is also requested that the reasoned justification then provides a short explanation of the importance of planning and designing developments to encourage more active and healthier lifestyles. Sport England’s Active Design guidance can be signposted to for detailed advice on how this can be achieved in practice.		proposals should have regard to the Sport England Active Design Guidance.
1427-0	Individual	Danny	Brady		Yes	Infra3	Not Stated	The GP practices are overloaded and	Not Stated								The GP practices are overloaded and getting appointments is a genuine	Infrastructure matters, including health, are covered by policies INFRA1-6 and the	N

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0002								getting appointments is a genuine struggle. Local hospitals are at breaking point.									struggle. Local hospitals are at breaking point.	supporting Infrastructure Delivery Plan (IDP).	
0282-0047	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra4	Not Stated		No	Consistent with National Policy	School playing fields are not considered public open space in the same way as parks or village greens. While some schools may allow community access to their playing fields, they are primarily intended for the physical education and recreation of the students who attend the school. Government guidance on school land says that school playing fields are provided for the benefit of pupils and their enjoyment, and any community use is usually at the school's discretion. There is a strong policy presumption against the disposal or change of use of school playing field land, and the Secretary of State's prior consent is needed for any such action. ECC require school playing fields being counted as 'open space' be deleted from the schedule in Appendix J and the Policies Map.	ECC require reference to school playing fields in Appendix J and on the Policies Map are deleted so they are not covered by Criteria 1.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	School playing fields should not be considered public open space and their change of use is restricted.	Accepted. The Council agrees that school playing fields are not public open spaces.	Delete reference to school playing fields in Appendix J and on the Policies Map for open spaces

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03410018	Organisation	Jane	Nuttall	Natural England		Infra4	Yes	We support the need for standards to ensure the adequate provision of open space in Castle Point. The design of new open space should be informed by local needs and opportunities, and provision should be sufficient to meet the requirements of new communities. As a baseline, Natural England recommends a	Yes							A	We support the need for standards to ensure the adequate provision of open space in Castle Point. The design of new open space should be informed by local needs and opportunities, and provision should be sufficient to meet the requirements of new communities. As a baseline, Natural England recommends a standard of 3Ha of accessible greenspace per 1000 people, with no net loss or reduction in this capacity. A higher level of provision of 8Ha of accessible greenspace per 1000 people may be needed where there are recreational pressure concerns on coastal Habitats Sites.	Broad support for open space standards noted. Modifications proposed as follows: <u>New addition to Policy Infra4</u> 6. New open spaces will be required for major developments on grey belt sites and greenfield sites in the urban area, according to the Council's Open Space Needs Assessment quantity, access and quality standards. This These will be required where there is a deficiency (by quantity or access) of open space types, or where the implementation of the development itself will lead to a deficiency. The benchmark scale of development that is normally expected to provide equipped/designated open spaces on site is as follows: <u>Modification to supporting text</u> 19.52 The Castle Point Open Space Needs Assessment recommends standards for	Yes. Broad support for open space standards noted. Modifications proposed as follows: <u>New addition to Policy Infra4</u> 6. New open spaces will be required for major developments on grey belt sites and greenfield sites in the urban area, according to the Council's Open Space Needs Assessment quantity, access and quality standards. This These will be required where there is a deficiency (by quantity or access) of

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								standard of 3Ha of accessible greenspace per 1000 people, with no net loss or reduction in this capacity. A higher level of provision of 8Ha of accessible greenspace per 1000 people may be needed where there are recreational pressure concerns on coastal Habitats Sites.										ensuring there is an adequate provision of open space across the Borough over the Plan period are set out below. # The assessment establishes quality standards for a whole range of different types of open spaces, and quantity and accessibility standards for the most common types of open space. Meeting these standards will also ensure that Natural England's 3ha/1000 population accessible greenspace standard is achieved. Add Title to Table 'Table x: Open Space Needs Assessment Quantity, and Access Standards' Delete final column in table 'Additional open space to be delivered') <u>Amendments/Additions to Supporting Text</u> 19.56 A Habitats Regulations Assessment will be	open space types, or where the implementation of the development itself will lead to a deficiency. The benchmark scale of development that is normally expected to provide equipped/designated open spaces on site is as follows: <u>Modification to supporting text</u> 19.52 The Castle Point Open Space Needs Assessment recommen ds standards for ensuring there is an adequate provision of open space across the Borough over the Plan period

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																		<p>required at application stage for any facility near to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked land), in order to demonstrate no adverse effects on site integrity.</p> <p>Where 8Ha per 1,000 new population of on-site SANG is required under Policy ENV3, this will replace the requirement for the Accessible Natural Green Space element of open space requirements detailed in Table x above.</p>	<p>are set out below. # The assessment establishes quality standards for a whole range of different types of open spaces, and quantity and accessibility standards for the most common types of open space. Meeting these standards will also ensure that Natural England's 3ha/1000 population accessible greenspace standard is achieved.</p> <p>Add Title to Table 'Table x: Open Space Needs</p>

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																			<p>Assessment Quantity, and Access Standards' Delete final column in table 'Additional open space to be delivered')</p> <p><u>Amendments/Additions to Supporting Text</u> 19.56 A Habitats Regulations Assessment will be required at application stage for any facility near to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked land), in order to demonstrate no adverse effects on site integrity.</p>

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																			Where 8Ha per 1,000 new population of on-site SANG is required under Policy ENV3, this will replace the requirement for the Accessible Natural Green Space element of open space requirements detailed in Table x above.
0338-0009	Organisation	Catherine	Bicknell	NHS Mid and South Essex		Infra4	Yes	The ICB advocated the protection of attractive and accessible open spaces including appropriate signage, toilet facilities and availability for	Yes		The ICB is satisfied that Policy Infra4 provides a good framework for securing improvements to open space provision, albeit that it does not specifically describe signage requirements or the provision of public toilets.					A	The ICB is satisfied that Policy Infra4 provides a good framework for securing improvements to open space provision, albeit that it does not specifically describe signage requirements or the provision of public toilets.	The ICB is satisfied that Policy Infra4 provides a good framework for securing improvements to open space provision, albeit that it does not specifically describe signage requirements or the provision of public toilets.	N

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								community events.												
0937-0014	Individual	Jonathan	Pinnock		Yes	Infra 4	Yes		Yes					Not Answered	Not Answered		A	Supports policy INFRA4	Support noted.	N
1440-0015	Organisation	Joseph	Beale	RSPB	Yes	Infra4	Yes		No	Justified	While there are some good aspects to this Policy, specific dog walking open spaces/areas should be mentioned here. One third of British households have one or more dogs, yet there is no specific provision in the Policy. There is also another excellent opportunity to implement pollinator and Nightingale corridors, following Essex LNRS principles, via scrub and flower-rich grassland.	There should be a reference added regarding the creation of specific dog walking open spaces, to be located away from the more sensitive sites and from more sensitive areas of new habitat creation. There is the opportunity to implement pollinator and Nightingale corridors, via scrub and flower-rich, low-nutrient grassland, that can be specified in this Policy.	No				While there are some good aspects to this Policy, specific dog walking open spaces/areas should be mentioned here. One third of British households have one or more dogs, yet there is no specific provision in the Policy. There is also another excellent opportunity to implement pollinator and Nightingale corridors, following Essex LNRS principles, via scrub and flower-rich grassland.	Para 19.52 shows that a significant proportion of the open space will be accessible natural greenspace which will be designed according to site and local circumstances.	N	
0738-00	Organisation	Roy	Warren	Sport England	Yes	INFRA4	Yes		Yes		The policy is supported (especially part 2 and 4) as it supports the protection of open space including playing pitches unless suitable			No	Not Answered		A	Supports INFRA4 and its protection of open space and playing pitches	Support noted.	N

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0111											criteria are met. The policy would be considered to be justified by the Council's evidence base for sport (Playing Pitch Strategy) and paragraphs 103 and 104 of the NPPF and Sport England's Planning for Sport Guidance and Playing Fields Policy https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance										
0338-0004	Organisation	Catherine	Bicknell	NHS Mid and South Essex		Infra5		Policy Infra5 – Indoor Leisure and Sports recognises that access to opportunities for sport and physical activity is important to the health and well-being of communities and to increase participation in physical activity, the								A	The ICB requested that the Plan, in addition to new development creating healthy environments and associated infrastructure, is drafted to help improve health in existing areas and reduce health inequalities that exist in the district. The Council's Issues and Options Consultation Statement 2025 explains that: • Policy Infra5 – Indoor Leisure and Sports recognises that access to opportunities for sport and	Support noted. Health factors and presence of health-care services is monitored as part of the Plan Monitoring Framework. Similarly, open space, recreation and highway safety all form part of the background evidence supporting the plan-making process. This evidence has been used to inform policies and to improve performance in these areas as appropriate.	N		

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								Council will seek to secure new and improved indoor leisure and sports facilities .									<p>physical activity is important to the health and wellbeing of communities and to increase participation in physical activity, the Council will seek to secure new and improved indoor leisure and sports facilities.</p> <ul style="list-style-type: none"> • Secure developer contributions towards new healthcare space with the NHS determining how new provision should be provided. • Work with partners in the NHS to retain and continue to extend outreach services from the hospitals in the local area. • Work with partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issue and priorities 		

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																	emerging through the Joint Strategic Needs Assessment (JSNA) and the Essex Joint Health and Wellbeing Strategy. The text explains that this will involve improvements to housing and to the environment, such as accessibility standards in new homes, improving active design, improving the quality of open spaces and making roads safer for walking and cycling. Taken together the Canvey place policies seek to deliver new housing, deliver improvements to the town centre environment guided by a master planning process, maintain and improve open spaces and public realm, and enhance accessibility to and around the		

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																	island. Similar policies are proposed for other places in the district. The ICB supports the inclusion of these policies and requests that their effectiveness in improving health in existing areas and reducing health inequalities that exist in the district is monitored and opportunities are taken to amend policies to improve performance in these areas as appropriate.		
0738-0012	Organisation	Roy	Warren	Sport England	Yes	INFRA5	Yes		Yes		The policy and its reasoned justification are supported as it supports the protection of indoor sports facilities and securing provision for additional or enhanced indoor sports facilities and outdoor sports facilities/playing pitches in new development. The policy and reasoned justification would be considered to be justified by the Council's evidence base for sport (Playing Pitch Strategy and Built Facilities Strategy) and paragraphs 103 and 104 of the NPPF and Sport England's Planning for Sport Guidance		No	Not Answered		A	Supports INFRA5 and the protection of and provision of enhanced indoor sports facilities	Support noted.	N

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											https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance									
092-0001	Organisation	Michael	Bevin gton	Electro sensitivity UK	Yes	INFR A6	Yes		No	Effective	<p>§§ 19.71 and 19.73 recognise that the ICNIRP Guidelines exclude protection for people with implants.</p> <p>(a) However, the Castle Point Plan Draft document does not recognise that the ICNIRP Guidelines also exclude protection for long-term and non-thermal effects of radiofrequency radiation and EMFs. Long-term and non-thermal effects have been established since 1953 and include neurological and cardiovascular harm, infertility and cancers. Therefore both EMFs and RF-EMF have been classified as 2B carcinogens since 2001 and 2011 respectively and three recent studies have found that RF-EMFs should be considered a class 1 known cancer, including studies by the FDA/NTP and the WHO. Since EMFs and RF-EMF are carcinogenic through long-term and non-thermal exposures, the Draft document should recognise that all emissions of RF-EMFs are extremely hazardous to all residents and people near them. A common set-back adopted elsewhere is 500m from housing, residences, schools and hospitals.</p> <p>(b) One established result of exposure to man-made EMFs and RF-EMFs is the condition</p>	19.75 It is recognised that the ICNIRP Guidelines are not protective for people with implants and against long-term and non-thermal effects. Therefore where possible wireless infrastructure should be sited over 500m from residences, schools and hospitals.	No	Not Answered	Not Answered	A	<p>§§ 19.71 and 19.73 recognise that the ICNIRP Guidelines exclude protection for people with implants.</p> <p>(a) However, the Castle Point Plan Draft document does not recognise that the ICNIRP Guidelines also exclude protection for long-term and non-thermal effects of radiofrequency radiation and EMFs. Long-term and non-thermal effects have been established since 1953 and include neurological and cardiovascular harm, infertility and cancers. Therefore both EMFs and RF-EMF have been classified as 2B carcinogens since 2001 and 2011 respectively and</p>	Noted	N	

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											<p>Electromagnetic Hypersensitivity. This has been recognised since 2021 by 32 worldwide experts in their Scientific Consensus International Report. This represents the mainstream viewpoint as opposed to the ICNIRP minority viewpoint which denies the need to protect against long-term and non-thermal effects. ICNIRP's minority viewpoint is based on Schwan's invalidated hypothesis of 1953 that the only effect of RF-EMF is heating, but this has been disproved in numerous scientific studies.</p> <p>(c) To protect people with the condition Electromagnetic Hypersensitivity a set-back of at least 500m from masts is required. Estimates of the percentage of the population with the condition Electromagnetic Hypersensitivity typically range from 1.6 to 3.5%. Mainstream science, such as the International Commission on the Biological Effects of Electromagnetic Fields, regards the ICNIRP Guidelines as unproductive of the general population. Appropriate protective guidelines are e.g. EUROPAEM 2016 and IGNIR.</p>						<p>three recent studies have found that RF-EMFs should be considered a class 1 known cancer, including studies by the FDA/NTP and the WHO. Since EMFs and RF-EMF are carcinogenic through long-term and non-thermal exposures, the Draft document should recognise that all emissions of RF-EMFs are extremely hazardous to all residents and people near them. A common set-back adopted elsewhere is 500m from housing, residences, schools and hospitals.</p> <p>(b) One established result of exposure to man-made EMFs and RF-EMFs is the condition Electromagnetic Hypersensitivity. This has been recognised since</p>		

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																	<p>2021 by 32 worldwide experts in their Scientific Consensus International Report. This represents the mainstream viewpoint as opposed to the ICNIRP minority viewpoint which denies the need to protect against long-term and non-thermal effects. ICNIRP's minority viewpoint is based on Schwan's invalidated hypothesis of 1953 that the only effect of RF-EMF is heating, but this has been disproved in numerous scientific studies.</p> <p>(c) To protect people with the condition Electromagnetic Hypersensitivity a set-back of at least 500m from masts is required. Estimates of the percentage of the population with the condition</p>		

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																	<p>Electromagnetic Hypersensitivity typically range from 1.6 to 3.5%. Mainstream science, such as the International Commission on the Biological Effects of Electromagnetic Fields, regards the ICNIRP Guidelines as unproductive of the general population. Appropriate protective guidelines are e.g. EUROPAEM 2016 and IGNIR. Suggested Mod: 19.75 It is recognised that the ICNIRP Guidelines are not protective for people with implants and against long-term and non-thermal effects. Therefore where possible wireless infrastructure should be sited over 500m from residences, schools and hospitals.</p>		

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07680001	Organisation	Eileen	O'Connor	EM Radiation Research Trust	Yes	INFRA6	No	The consultation process risks breaching the Gunning Principles by failing to provide sufficient information on the health, fire, and safety risks of telecommunications infrastructure. In addition, reliance on ICNIRP self-certification, including certificates submitted under dissolved or invalid company names,	No		See attachment for further justification. Policy Infra6 is not sound because it: Relies solely on ICNIRP guidance, which only considers thermal effects and ignores substantial evidence of non-thermal biological effects. Assumes mast sharing automatically reduces impacts, when in fact it can intensify local exposures and fire risks. Fails to apply the precautionary principle, despite WHO/IARC 2025 findings confirming carcinogenicity in animals. Fails to protect vulnerable groups (children, elderly, AIMD users, electrosensitive individuals), contrary to national equality and planning policy. Ignores legal precedents (Thomas v. Cheltenham, Skelt v. Secretary of State) confirming that ICNIRP compliance cannot negate legitimate health objections.	Modifications necessary to make the plan legally compliant and/or sound: Abandon sole reliance on ICNIRP self-certification; require independent expert certification for all telecoms infrastructure. Apply minimum setbacks: 500 m from homes, 1,000 m from schools and sensitive sites. Explicitly protect vulnerable groups (children, elderly, AIMD users, cancer survivors, electrosensitive individuals). Require full planning scrutiny for all base stations, including those under 15 m. Prioritise fibre-to-the-premises (FTTP) broadband over wireless deployment. Apply Stewart	No	Not Answered	Yes	A	Objects to INFRA6 because: Failure to provide sufficient information health, fire and safety risks of telecommunications infrastructure Reliance on ICNIRP self certification may be unlawful - doesnt take into account non-thermal biological effects Failing to consider the needs of vulnerable groups	Health, Fire and Safety Risks These are covered under building regulations to ensure any development of this nature is safe. ICNIRP Referring to the International Commission on Non-Ionizing Radiation is best practice and ensures the applications submitted are regulated under this body. Failing to consider the needs of vulnerable groups The entirety of the plan has been assessed to consider the needs of vulnerable groups, please see the Equality Impact Assessment. Further to this policy INFRA 6 requires a risk assessment to be submitted. To ensure compliance with the Public Sector Equality Duty (PSED), a modification has been added for an equality impact	2b. an assessment of whether there would be any impacts of the proposal to individuals or groups protected under the equalities act, by carrying out an Equality Impact Assessment and identifying any appropriate mitigation measures; and

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								may be unlawful. The plan also risks breaching the Council's Public Sector Equality Duty (Equality Act 2010, Section 149) by failing to consider the needs of vulnerable groups such as people with medical implants and those with electromagnetic hypersensitivity (EHS).				<p>Report recommendations, especially preventing the "beam of greatest intensity" from falling on schools.</p> <p>Conduct mandatory fire and structural risk assessments for all masts and small cells.</p> <p>Require disclosure and regulation of operating power levels, modulation types, pulsing, and the cumulative effect of multiple frequency bands, with independent monitoring and enforcement.</p> <p>Adopt biologically based exposure guidelines recommended by independent scientists (e.g., BioInitiative and Building Biology guidelines), which apply precautionary safety limits far below ICNIRP thresholds.</p>						assessment to be undertaken so that the impact on any affected groups has been consciously considered.	

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02820048	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra6	Not Stated		Yes		<p>ECC welcome reference to the Essex Design Guide and in particular the EPOA Planning Guidance for Digital Connectivity (focused on fixed line Broadband connections) to guide the pre-application and planning application process for mobile (4G/5G).</p> <p>The proposed growth is likely to have a considerable impact on existing or planned cellular network capacity. It will be essential for early collaboration between developers, local planning authorities and mobile network operators (or their infrastructure partners) to identify suitable locations for new or upgraded masts that minimise impact on the local community and environment while effectively addressing connectivity needs.</p>		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Collaboration between developers, local authorities and mobile network operators will be essential to minimise the impact on the cellular network capacity from proposed growth. Welcomes reference to the Essex Design Guide and the EOPA Planning Guidance for Digital Connectivity	CPBC agrees that it will be important to collaborate early with digital stakeholders and developers to address communities' digital needs with minimum impact from digital structures. Noted no modifications.	
02820049	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra6	Not Stated		No	Consistent with National Policy	<p>To be consistent with NPPF, paragraph 120 reference should be made to the potential for mast sharing wherever possible to minimise impacts, along with their sympathetic design and camouflage with the local area. ECC welcome reference to the Essex Design Guide and in particular the EPOA Planning Guidance for Digital Connectivity (focused on fixed line Broadband connections) to guide the pre-application and planning application process for mobile (4G/5G).</p>	<p>ECC require paragraph 19.70 is amended to read:</p> <p>However, initial roll out of 5G provision has highlighted some design, layout and siting concerns that need to be addressed in future provision. Use of existing masts, buildings and other structures should be encouraged.</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Recommends digital mast sharing and sympathetic designs to minimise impacts of digital infrastructure. Typo to be corrected</p>	Accepted. CPBC agree that mast sharing and good design can minimise the impact of masts on the local area.	However, initial roll out of 5G provision has highlighted some design, layout and siting concerns that need to be addressed in future provision. Use of existing masts, buildings

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												Where new sites are required (such as for new 5G networks) equipment should be sympathetically designed and camouflaged where appropriate								and other structures should be encouraged. Where new sites are required (such as for new 5G networks) equipment should be sympathetically designed and camouflaged where appropriate. The Essex Design Guide includes a section on 'Planning for 5G'....
0700001	Individual	Markus	Springer		Yes	INFRA6	Yes		Yes		I wish to say that it is fantastic to see common sense being applied in telecommunications mast planning. I am all for increased connectivity, however the siting of masts needs to be carefully weighed up in evidence based decisions, especially when they are located near vulnerable residents, for example children or elderly people with disabilities [REDACTED Personal Information] interference with EMF's is a real problem. For too long, genuine concerns around safety have		Not Answered	Not Answered	Yes		Support for Policy INFRA6	Support noted.	N	

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											been ignored and it is wonderful to see a sensible and pragmatic approach being proposed.								
0889-0002	Individual	Lara	Lawson		Yes	Infra 6	Not Answered		Not Answered		<p>I would like to add that these ICNIRP 'Safety' Certificates have been also been self certified.</p> <p>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.</p> <p>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 also not registered at Companies House.</p> <p>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.</p> <p>There are also many other concerns with regards to this infrastructure, reduction in property prices to the surrounding houses.</p> <p>We ask that these concerns be taken into account when introducing any more of this</p>		Not Answered	Not Answered	Yes - See attachments	None	Objecting to INFRA6: Concerned due to exposure of non ionizing radiation reduction in house prices	<p>ICNIRP Referring to the International Commission on Non-Ionizing Radiation is best practice and ensures the applications submitted are regulated under this body.</p> <p>Further to this policy INFRA 6 requires a risk assessment to be submitted which will ensure all protected groups are taken care of.</p> <p>Reduction in house prices This is not a material planning consideration.</p>	N

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											infrastructure to residential areas.								
0889-0001	Individual	Lara	Lawson		Yes	Infra 6	Not Answered		Not 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-Ionizing Radiation is best practice and ensures the applications submitted are regulated under this body.	N

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											<p>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 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 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</p>													

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											Certificates issued in the name of 'Three UK Limited' dissolved in 2015 – Radiation Research									
0937-0015	Individual	Jonathan	Pinnock		Yes	Infra 6	Yes		Yes				Not Answered	Not Answered		A	Supports policy INFRA6	Support noted.	N	

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02820078	Organisation	Kevin	Fraser	Essex County Council	Yes	Infrastructure Delivery Plan	Not Stated		No	Positively prepared, justified, effective, consistent with national policy	<p>ECC has input to the baseline IDP Baseline Review (2024) and the IDP, May 2025 with regards ECC's roles and responsibilities.</p> <p>The published IDP (May 2025) is not based on the infrastructure requirements required to deliver either Government's standard methodology housing requirements or the CPBC 6,196 homes, as set out in Policy SP3 but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt. ECC provided CPBC with an assessment of these scenarios regarding primary, secondary and early years and childcare. Other assumptions were made by the consultant on other services based on the Developers' Guide (2024). It is noted that this iteration excludes transport costs as the Transport Assessment and Addendum (West Canvey) were still being drafted and had not been reviewed by ECC.</p> <p>Paragraph 19.20 of the Plan refers to the IDP establishing where new educational facilities are required based on the growth identified within the Plan. Policy SP3 sets out how the Plan is seeking to deliver 6,196 homes with a spatial distribution and scale of specific sites/broad locations</p>	<p>Prior to submission of the Plan, the IDP will require a significant update to fully reflect the evidence base referenced in the Plan, as a significant amount has been undertaken since the latest IDP.</p> <p>ECC will need to undertake a cumulative assessment of the growth for education and early years and childcare and assist to identify the necessary highway and transportation interventions necessary, along with any other relevant ECC roles and responsibilities.</p> <p>ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>ECC has reviewed the IDP May 2025, however, there have been some additional changes to housing strategy with the addition of new sites including a large site at West Canvey. There has also been updated evidence following May 2025. All of this needs to be fed into an updated IDP for ECC to review prior to submission of the plan for examination Requests some additional amendments to Chapter 11 of the IDP including reference to the upgrading of RCHW facilities at Canvey, references to the adopted Waste Strategy for Essex (2024), a need for change waste management approaches</p>	<p>CPBC have provided ECC with updated data for the cumulative assessment of primary, secondary and early years education and childcare and SEND.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p> <p>The West Canvey IDP has been provided to ECC for comment and comments provided, which require review by CPBC.</p> <p>CPBC are preparing an update to the IDP which will be one consolidated report (including relevant sections of the May 2025 and West Canvey Addendum October 2025) and address any outstanding issues including new and/or updated evidence that has been published and/or completed since that which</p>	

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											<p>different to the IDP Scenarios previously assessed. ECC considers such differences will have a significant impact on the overall infrastructure requirements, specific site policy infrastructure requirements and potentially Whole Plan Viability Assessment.</p> <p>Whilst the strategy remains 'urban focussed' the allocated sites informing the IDP, May 2025 and site allocations in the Plan differ in terms of scale and their distribution. These disparities are further contained within the IDP/Transport Assessment and the Plan (including Site Policies) and the Housing Capacity Topic Paper.</p> <p>The Sustainability Appraisal, paragraph 28, bullet 1 infers that the plan policy position and Scenario 1 in the IDP are similar. In fact, there are significant differences in that some sites have been removed from the Plan and some 16 sites have been subject to significant change, which will impact on any infrastructure requirements. For example, West Canvey has increased from 1,000 to 2,700 homes (of which 700 post 2043) and Canvey Town Centre has increased from 200 to 820 homes.</p> <p>CPBC did not request or provide the relevant information for ECC to</p>	<p>commencement of the consultation. ECC has instructed Essex Highways to review these documents and their full report has informed the response to this consultation. Any revised assessment will need to inform the next iteration of the IDP.</p> <p>The revised IDP will need to inform a review of the Whole Plan Viability Assessment which assesses the viability of the Castle Point Plan, taking into account policy requirements. ECC, as the WDA seek the following amendments:</p> <p>Paragraph 11.1.3</p> <p>The WDA prepares the necessary strategies, infrastructure and contractual arrangements for the management of local authority collected waste</p>							<p>informed the IDP May 2025. Some examples are set out in the ECC Regulation 19 response and include the Transport assessment and further education assessment. The final IDP will be made available to ECC to review.</p> <p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the IDP and Transport Assessment, will be considered by an independent Inspector appointed to examine the Plan and will continue to work together to address outstanding matters as far as possible."</p> <p>Accepted and inserted into IDP</p> <p>ECC has reviewed a draft West Canvey IDP update and provided comments along with a further</p>	

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											<p>undertake the required cumulative assessment of the growth in the Plan, with regards its potential impact on education and early years and childcare places. This is required to be undertaken prior to submission consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (February 2025).</p> <p>To demonstrate potential implications, ECC, as the lead authority for Education, has undertaken a 'high-level' assessment of the Plan growth (see Appendix 4). The assessment identifies the following changes in requirements:</p> <ul style="list-style-type: none"> • Consultation Plan – identifies the need for two 56 place early years and childcare nurseries and primary provision (non-defined). • ECC assessment – identifies the need for at least a new 2FE primary school; three new 72 place nurseries, of which one should be co-located with the primary school; one stand-alone 56 place nursery and potentially two further stand-alone 30 place nurseries subject to land being made available by developers. Other developer contributions where there are insufficient places to meet the generated demand. <p>In addition, significant</p>	<p>to support the delivery of the current Waste Strategy for Essex (WSfE). The WSfE for Essex sets the vision for the management of waste collection. The core focus of the WSfE JMWMS is to ensure the establishment of appropriate waste</p> <p>Paragraph 11.1.4</p> <p>Paragraph 11.1.5</p> <p>The WSfE recognises that waste management approaches need to change, which is expected to may necessitate new or expanded waste management infrastructure.</p> <p>Paragraph 11.2.5</p> <p>The Essex Developers Guide to Infrastructure Contributions details the scope and range of contributions Essex County Council may seek from developers</p>							<p>education assessment to reflect the full policy requirement of 2,700 homes, rather than the 2,000 within the plan period.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p> <p>CPBC are preparing an update to the IDP which will be one consolidated report (including relevant sections of the May 2025 and West Canvey Addendum October 2025) and address any outstanding issues including new and/or updated evidence that has been published and/or completed since that which informed the IDP May 2025. Some examples are set out in the ECC Regulation 19 response and include the Transport assessment and further education assessment. The</p>	

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											<p>evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including the updated Developers' Guide (September 2025); Castle Point LCWIP; Essex Wide LCWIP; Transport Assessment (July 2025) and West Canvey Addendum (August 2025); Local Transport Plan A Better Connected Essex Transport Strategy (July 2025) and South Essex Implementation Strategy (July 2025); Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); ELNRS (July 2025); and Shared Standards in Water Efficiency (June 2025).</p> <p>CPBC and its consultants Systra have held regular meetings with ECC with regards the preparation of the transportation evidence base. The TA Scoping Report was reviewed by ECC and considered an appropriate piece of evidence to support the Regulation 18 Consultation (Issues and Options – July – September 2024). However, ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of the consultation. An update to the Transport Assessment</p>	<p>and land owners to mitigate the impact of developments on waste management infrastructure. 11.4 Evidence base:</p> <ul style="list-style-type: none"> ECC Developers' Guide to Infrastructure Contributions, ECC, 20254 <p>Paragraph 11.5.3</p> <p>This could be co-located with a WCA depot and/or RCHW facility and we are keen to explore opportunities for joint working with Castle Point Borough Council where possible.</p>							<p>final IDP will be made available to ECC to review.</p> <p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the IDP and Transport Assessment, will be considered by an independent Inspector appointed to examine the Plan and will continue to work together to address outstanding matters as far as possible."</p>	

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											<p>(TA), Transport Assessment Addendum; and Green Belt Sites Assessment will be required to address the issues, observations and queries identified following the ECC review of these documents (see Appendix 5) and will subsequently inform an update to the IDP.</p> <p>The Submission Plan must be supported by an up-to-date IDP that reflects updated information consistent with that iteration of the Plan, which will need to be agreed with ECC as a primary infrastructure provider prior to submission.</p> <p>With regards Chapter 11 – Waste Management, ECC, as the Waste Disposal Authority, would welcome the opportunity to review the IDP prior to submission. The WDA supports the following references in the IDP May 2025:</p> <ul style="list-style-type: none"> • paragraph 11.2.2 - ECC through the new WSfE is exploring the need for and options available for the provision of new and additional waste transfer, bulking and haulage infrastructure capacity within South Essex. A new long-term residual waste solution is required which depending on the location may require waste infrastructure for bulking and haulage in the South of Essex. While there are currently no specific plans for new or expanded waste infrastructure, 													

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											<p>requirements will emerge during WSfE action planning. The WDA aim to explore the potential employment land that may be suitable for the provision of new WDA logistical waste infrastructure within South Essex.</p> <ul style="list-style-type: none"> • paragraph 11.2.3 - existing RCHW facilities do not match the level of growth being planned in the County and will be a challenge to meet current demand and potentially worse with more growth. ECC, as the WDA, is exploring the potential for upgrading RCHW provision to improve facilities available for residents and businesses. • paragraph 11.2.4 - there will be a need to explore the options for upgrading the Canvey RCHW's and new or additional sites to serve the Borough and adjacent areas. <p>The WDA would like to highlight a number of amendments in advance of any update to the IDP:</p> <ul style="list-style-type: none"> • references to the adopted Waste Strategy for Essex (2024) – paragraphs 11.1.3, 11.1.4, 11.4 • more positive need to change waste management approaches – paragraph 11.1.5 • update reference to the Essex Developers Guide to Infrastructure Contributions (2025) with updated advice regarding waste management – paragraphs 11.2.5, 11.4 • South Essex sub-region 									

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											lacks the required level of waste infrastructure for the efficient movement of waste from source to treatment facilities. A new transfer station capacity is required which could be co-located with a WCA depot and/or RCHW facility. – paragraph 11.5.3									
0354004	Organisation	Mark	Sheppard	Southern City Council		Monitoring Framework	Not Stated		Not Stated			Finally, within the proposed Monitoring Framework, we suggest monitoring the percentage of Health Impact Assessments submitted in accordance with relevant application thresholds. An additional indicator is also				A	Within the proposed Monitoring Framework, we suggest monitoring the percentage of Health Impact Assessments submitted in accordance with relevant application thresholds. An additional indicator is also	Mods proposed <ul style="list-style-type: none"> Monitoring Framework Objective 19 – update the monitoring indicator to read as “submission percentage of health impact assessments submitted for relevant applications” Monitoring Framework 	Y	

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												suggested to monitor the number of new community use agreements (objective 20).					suggested to monitor the number of new community use agreements (objective 20).	Objective 20 – additional monitoring indicator included to read as “ number of new community use agreements per year ”	
02230002	Individual	Brian	Botham		Not Stated	Not Stated	Not Stated	I have recently written to you making objections to the proposed plan. Something that I really should have mentioned and didn't are the two COMAH sites on Canvey, one of which supplies aviation fuel to the RAF, this must surely qualify as a potential terrorist target.	Not Stated				Not Stated		No		Cites the two OMAH sites are a potential terrorist target	Noted	N
048	Individual	Grace	Walker		Yes	Not Stated	N/A	Not aware of the legal	Not Stated		Have not seen the regulations regarding to soundness so						Not able to comment	Noted.	N

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0-0001								requirements therefore cannot comment			cannot comment without sight of some.						without seeing the regs		
14230001	Individual	Roger	Gibbs			Page 31, Section 7 - Place Based Approach. (Ref Thundersley)	Not Stated	First, my thanks to you all at the Planning Department on what appears a very well presented and thoughtful plan. Overall my only comment would be that we must try hard to keep down the number of new houses that must be squashed in. Our borough has a tiny area compromised by an excessively large proportion	Not Stated		The diagram illustrates a problem where the area of Thundersley is "C" shaped. The wider Chase developments (and many new developments off Kiln Road etc) have no proper footpath connection to Thundersley village. The route along the un-made middle of The Chase is narrow, generally muddy, and made unsafe with frequent vehicles splashing past walkers. At night it is a no-go route. Please make it a priority to provide a well lit, hard path for pedestrians going from the eastern part of The Chase developments towards Thundersley village. It would probably make a good contribution to reducing short car usage between these points for children going to / from school, visits to doctors, chemist, etc. The point above also highlights the lack of any bus routes serving this area. Wensley Road is another muddy track making it unsuitable for easy walking to the Kiln Road bus routes. We had expected a footpath from The Swale into the recent Kiln Road housing. (Presumably the developers didn't want to lose a few feet of housing opportunity?) No bus routes now serve Rayleigh Road. Delighted to see a commitment to preventing						Generally supportive of a very well presented and thoughtful plan. The diagram illustrates a problem where the area of Thundersley is "C" shaped. The wider Chase developments (and many new developments off Kiln Road etc) have no proper footpath connection to Thundersley village. The route along the un-made middle of The Chase is narrow, generally muddy, and made unsafe with frequent vehicles splashing past walkers. At night it is a no-go route. Please make it a priority to provide a well lit, hard path for pedestrians going from the eastern part of	Noted. Highways and Public Rights of Way are both County matters and managed by Essex County Council https://www.essexhighways.org/roads-and-pavements/public-right-of-way-maintain The Plan has endeavoured to produce policies that protect and enhance the Borough's valued biodiversity and green infrastructure.	N

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								on of historically designated green belt. I can see you equally recognise the problem. I will only focus my views on the Thundersley area [REDACTED Personal Information]			Coalescence between Thundersley / Benfleet / Hadleigh / Daws Heath. I hope this will be enshrined in true protection. There are still a few remaining areas of woodland and fields along The Chase, Wensley Road, Swale Road, Warren Chase, that have somehow survived the developers. Can we please get some firm legal protection on the these vital green plots. When we came to the area in [REDACTED Personal Information] it was common the see hundreds of varieties of birds, and animal species. Now is mostly seagulls, magpies, and rats. A lot more is still about, although harder to find. They are just clinging to survival in a few areas. Please don't just leave your commitments to nature and wildlife corridors as empty words on paper.						The Chase developments towards Thundersley village. It would probably make a good contribution to reducing short car usage between these points for children going to / from school, visits to doctors, chemist, etc. The point above also highlights the lack of any bus routes serving this area. Wensley Road is another muddy track making it unsuitable for easy walking to the Kiln Road bus routes. We had expected a footpath from The Swale into the recent Kiln Road housing. (Presumably the developers didn't want to loose a few feet of housing opportunity?) No bus routes now serve Rayleigh Road. Delighted to see a commitment to preventing Coalescence between		

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																	Thundersley / Benfleet / Hadleigh / Daws Heath. I hope this will be enshrined in true protection. There are still a few remaining areas of woodland and fields along The Chase, Wensley Road, Swale Road, Warren Chase, that have somehow survived the developers. Can we please get some firm legal protection on the these vital green plots. When we came to the area in 1985 it was common the see hundreds of varieties of birds, and animal species. Now is mostly seagulls, magpies, and rats. A lot more is still about, although harder to find. They are just clinging to survival in a few areas. Please don't just leave your commitments to nature and wildlife corridors		

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																	as empty words on paper.		
0360002	Organisation	Marlene	Curtis	British Horse Society		Para 12.2					acknowledges the area's long history of equine activity and the potential of extending wildlife habitat and recreational access to improve connectivity to various nearby woodland sites				See attachment	B	Support for reference to equine activity and potential of extending wildlife habitat and recreational access to improve connectivity to various nearby woodland sites	Support noted.	N
0360007	Organisation	Marlene	Curtis	British Horse Society		Para 12.2					Regarding the Plan's stated long history of equine activity in this area, we remind of the "best value" a public bridleway status has by the inclusion of both walkers and cyclists. Horse riding (90% women - Sport England) is considered both beneficial to health and well-being. Women and girls also feel much safer riding a horse when alone in the countryside and quiet places. Additionally, wildlife accepts a rider atop a horse as another harmless animal and remains undisturbed. The relationship of birds enjoying horses is confirmed by the enclosed photo of five birds perched on a horse's back.				See attachment	B	Public bridleway status includes both walkers and cyclists. Horse riding is considered beneficial to heath and wellbeing. Women and girls feel safer riding a horse alone in the countryside and quiet places. Wildlife accept horse riders as harmless and remain undisturbed. See attachment.	Noted.	N
036	Organisation	Marlene	Curtis	British Horse Society		Para 12.3			No		The second point of introducing further cycle routes ... north along ...				See attachment	B	Routes along Daws Heath Road to Belfairs	Noted. Policy T3 seeks to support active travel routes,	N

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0-0008											Daws Heath Road to provide additional access to Belfairs Nature Reserve and West Wood, if West Wood's northern access adjacent the Ragwood Riding School is considered but the existing bridleway use is not included, we consider the Local Plan to be unsound. Regarding access for cyclists to the Nature Reserve, unless our Nature Reserve points above result in the inclusion of horse riders as well, we consider the Local Plan again to be unsound.						Nature Reserve and West Wood, should consider access to Ragwood Riding School and the existing bridleway. Access to the Nature Reserve should be for horse riders as well as cyclists.	including those for recreation for walkers, cyclists and horse riders. Essex County Council as the Highways and Transportation Authority are responsible for the management of Public Rights of Way, including Bridleways.	
0360010	Organisation	Marlene	Curtis	British Horse Society		Para 12.7					includes an existing 5.5 Mile "Seven Woods Walk" and here we would like to see horse riding use included. Alternatively, local horse riders would very much welcome a similar Ride of this distance being planned within the Borough's Woods.				See attachment	B	includes an existing 5.5 Mile "Seven Woods Walk" and here we would like to see horse riding use included. Alternatively, local horse riders would very much welcome a similar Ride of this distance being planned within the Borough's Woods.	Noted. This paragraph is identifying the woodland around Daws Heath.	N
0360004	Organisation	Marlene	Curtis	British Horse Society		Para 20.38					regarding the Thames Estuary Path and provision of a footpath and cycleway network connecting Tilbury to Leigh-on-Sea, we request inclusion and emphasise that horse riders also wish to travel further afield (at times enjoying B & Bs with their horse) in the same way as Peter de Savary's past refused intention of bridleway access				See attachment	B	Thames Estuary Path Project should include access to horse riders as well as walking and cycling.	Through work with the Council's partners on projects such as the Thames Estuary Path Project, the Council will encourage new or improvements to routes to be accessible for all	N

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											to Coal House Fort, and today also to reach the likely off-road access connected to the new Thames Crossing.							active travel modes.	
02820050	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20.4, Page 156	Not Stated		No	Not Stated	ECC require the following typo in paragraph 20.4 is amended to read: The Net Zero: Making Essex Carbon Neutral report details an Avoid, Shift and Improve approach for reducing transport emissions:		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Typo to be corrected	Accepted	...The Net Zero: Making Essex Carbon Neutral report details an Avoid, Shift and Improve approach for reducing transport emissions:
02820051	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20.6, 1st sentence, Page 156	Not Stated		No	Effective	Reference could be made to some of the projects in the South Essex Implementation Plan, Appendix A – Scheme List, which have emerged from a prioritisation exercise representing ideas from a snapshot in time but which are not guaranteed to be funded as part of LTP4. As funding and circumstances change so will priorities for such schemes. For example, the A13 sustainable corridor; A127/A130 Fairglens amongst others.	ECC require reference to the potential date of adoption of the LTP4 in the 1st sentence is amended to read: Winter 2025/2026	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference should be made to projects within the South Essex Implementation Plan Appendix A and some of the proposed schemes	Accepted. CPBC supports schemes and initiatives that improve the highway network in South Essex particular key routes such as A13 and the A127/A130 Fairglens junction.	ECC are currently in the process of updating the LTP, with a new LTP4 scheduled for adoption in 2025 winter 2026.
02820061	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20.63, Page 168	Not Stated		No	Effective	ECC seek an amendment to paragraph 20.63 to refer to the Essex Parking Guidance (2024) prepared by EPOA and clarification given to large scale development comprising of 1,000 homes or more.	ECC require paragraph 20.63 is amended to read: The Essex Planning Officers Association's (EPOA) Essex Parking Guidance	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing	B	Request correction that it is Essex Parking Guidance and not Essex Parking Standard and clarification that large scale development	Accepted and text amended	The Essex Planning Officers Association's (EPOA) Essex Parking Guidance Standard (2024)

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												(2024) were prepared with both the above balancing act in mind, and the need to move towards a net zero transport network. `.....and Part 2 – for Garden Communities and Large-Scale Developments (including a ‘Connectivity Tool’), where large is considered 1,000 homes or more.’			various pieces of evidence		represents 1,000 homes or more.		were prepared with both the above balancing act in mind, and the need to move towards a net zero transport network. and Part 2 – for Garden Communities and Large-Scale Developments (including a ‘Connectivity Tool’), where large is considered 1,000 homes or more. A study was commissioned to understand parking needs across Essex... The ECC Essex Local Transport Plan Development Management

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																			<p>nt Policies sets out within its highways planning advice specific requirements for developments that are likely to be regularly accessed by HGVs at policy DM19.This standard appears appropriate for other servicing and delivery vehicles that occasionally access many developments also. Design Guidance on Street Design with respect to waste collection can be found in the Essex Design Guide-Highways Technical Manual.</p>

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0282-0063	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20.69, Page 169	Not Stated		No	Effective	Further clarification should be provided that the ECC Development Management Policies are located on the ECC website under highways planning advice.	ECC require paragraph 20.69 is amended to read: The ECC Management Policies sets out within its highways planning advice specific requirements for developments that are likely to be regularly accessed by HGVs at policy DM19.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Provide link to ECC Development Management Policies Highways Planning Advice which are located on the ECC website. This provides advice on specific requirements for developments which are likely to be regularly accessed by HGVs.	Accepted and text amended with link to information	
0282-0054	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20:16, Page 159	Not Stated		No	Justified, Effective	Paragraph 20.16 refers to the need to improve the coverage, frequency, reliability and quality of bus services if a modal shift is to be achieved. There is no clarity on what level of modal shift is desired or how this may be achieved via specific schemes in the Schedule of Interventions (see comments to Policy T5 Highways Impact) and how it will impact highway capacity. This is important to demonstrate consistency with NPPF, paragraph 109 where LPAs are required to undertake a vision led approach to identifying transport solutions.	Please refer to the response to Policy T5 and the Transport Assessment.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Requires further clarity on specific schemes required to improve public transport services to support proposed growth	The proposed wording requires developers to provide active travel routes with high accessible specifications, which might not be possible due to site specifications on some travel route developments. CPBC proposes the following wording: New development must be designed to be inclusive, and to prioritise and maximise opportunities for safe and convenient active travel routes supporting health and active lifestyles. Design guidance on	

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																		inclusive active travel routes can be found on Active travel design resources Active Travel England This requirement should also be reflected in development proposals and master plans. The CPBC agrees that developer contributions for active travel should be appropriate and proportionate to the development taking account of the Infrastructure Delivery Plan. CPBC have updated the Plan's Transport Assessment following public consultation and will provide this for Essex Highways to review.	
02820055	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20:28, Page 161	Not Stated		Yes		Work is programmed to commence the permitted short-term A127 / A130 Fairglen Interchange (short term) improvements in 2025 and will cover a two-year construction period.	ECC require paragraph 20.28, final sentence is amended to read: Work on improvements to the Fairglen Interchange (short term) is expected to commence in 2025.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Comments that work on short term improvements to Fairglen Interchange are scheduled in 2025	Noted and text updated Work on initial improvements to the Fairglen Interchange (short term) is expected to commence in due course 2025.

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02820064	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20:71, Page 169	Not Stated		No	Effective	Whilst the requirements for waste collection vehicles are acknowledged in paragraph 20.71 and design of streets should be consistent with the Essex Design Guide – Highways Technical Manual which provides the full understanding of the relevant design principles for new residential developments. Refuse-collection vehicles will circulate on all parts of the adopted road system but not on private drives. In the case of mews court cul-de-sac, they will enter in reverse gear and not turn. Refuse collection will be made only from those dwellings within 25m of an adopted road local operatives may have different criteria. In other cases, it is necessary to provide a shared bin-collection point screened by an above-eye-level wall. This should be located within 25m of an adopted road.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference should be made to Essex Design Guide- Highways Technical Manual to ensure streets are designed to accommodate waste collection vehicles	Noted and additional text with reference to Design Guide Highways Technical Manual Added	
02820071	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.40, 2 nd sentence, Page 181	Not Stated		No	Effective		ECC seek an amendment to read: was recommended by the Essex Climate Action Commission (ECAC) in July 2021.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Update evidence date to 2024	Text already states July 2024	

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0282-0072	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.41, 1st sentence, Page 181	Not Stated		No	Effective	Reference should be made to evidence base for Policy SD4 being located and updated on the Essex Design Guide	ECC require the 1st sentence is amended to read: Evidence commissioned by the Climate and Planning Unit of Essex County Council on behalf of all the Greater Essex local authorities to demonstrate that building to the net zero carbon (in operation) standard set out in Policy SD4 is published and updated where necessary on the Essex Design Guide)	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference Essex Design Guide in Policy SD4	Accepted and text amended	Evidence commissioned by the Climate and Planning Unit of Essex County Council on behalf of all the Greater Essex local authorities to demonstrate that building to the net zero carbon (in operation) standard set out in Policy SD4 is published and updated where necessary on the Essex Design Guide ECAC demonstrates that building to the net zero carbon (in operation) standard set out in Policy NZ1 is: • Technically

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																			feasible (Report 1: Essex Net Zero Policy – Technical Evidence Base by Introba, Etude, Currie & Brown, July 2023 and Report 2: Essex Net Zero Policy – Policy Summary, Evidence, and Validation Requirements by Introba, Etude, Currie & Brown July 2023); <ul style="list-style-type: none"> Financially viable (Net Zero Carbon Viability Study for Essex by Three Dragons, August 2022); and the Net Zero Carbon Viability and Toolkit Study, Essex Climate

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																			Action Commission October 2025) and • Legally justified (Essex Open Legal Advice – Energy policy and Building Regulations by Estelle Dehon KC, Cornerstone Barristers, April 2023).
02820069	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.41, Page 181	Not Stated		No	Effective	ECC seek paragraph 21.41 is updated to provide a link to the most up-to-date evidence base and implementation guidance documents. This will ensure the longevity of the references in the Plan.	ECC seek paragraph 21.41 is amended to read: Evidence commissioned by the ECAC demonstrates that building to the net zero carbon (in operation) standard set out in Policy GEN1 is technically feasible; financially viable and legally justified. The evidence to support this policy is set out in the Essex Design Guide on the Net Zero Evidence page. The evidence will	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Provide links to most up-to-date evidence guidance on the Essex Design Guide Net Zero Evidence Base	Accepted and link updated	

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												continue to be refreshed to help support and demonstrate the deliverability of net zero carbon development in Essex. Further information on the implementation of the policy can be viewed on the policy implementation page.								
02820073	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.43, Page 181	Not Stated		No	Justified, Effective	Paragraph 21.43 should be revised to state that the EPOA Embodied Carbon Embodied Policy Study has fed into this new EPOA Planning Policy Statement – Embodied Carbon and Circular Economy (October 2025) which sets out policy SD5. It should be made clear that this is the document to refer to when interpreting policy for SD5.	ECC require paragraph 21.43 is amended to read: The outcomes of this work have fed into the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero) and EPOA Planning Policy Statement – Embodied Carbon and Circular Economy. These documents set out the Essex-wide model policies upon which policies SD4 and SD5 are based and the documents provide an explanation of each of the	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Clarify that the EPOA Embodied Carbon Policy Study fed into the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy (October 2025)	Accepted and text amended	The outcomes of this work have fed into the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero) and EPOA Planning Policy Statement – Embodied Carbon and Circular Economy. These documents set out the Essex-wide model policies upon which policies SD4 and	

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required	
												different policy requirements in detail. These documents should be referred to when interpreting policies SD4 and SD5 respectively.								SD5 are based and the documents provide an explanation of each of the different policy requirements in detail. for Net Zero Carbon Homes and Buildings in Greater Essex document. This sets out policies SD4 and SD5 and provides an explanation of each of the different policy requirements in detail. This should be referred to when interpreting this policy. These documents should be referred to when interpreting policies SD4 and SD5

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																			respectively.
10130005	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	Policies Map	Yes		No	Justified	<p>Anglian Water supports the principle of the Green Lung designation in helping to support nature recovery on Canvey Island and consistency with the aims of the Local Nature Recovery Strategy for Essex.</p> <p>However, whilst our Canvey Island water recycling centre (WRC) is mainly excluded from the Green Lung designation on the Policies Map, it does not reflect all our operational land for this site. Our landownership for Canvey Island WRC extends further than shown on the Policies Map and includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.</p>	<p>Anglian Water requests that the Policies Map excludes the entirety of our WRC operational land from the land indicated as 'Green Lung' (and any overlapping area identified as 'Park Homes' sites) to ensure that future operational or engineering works required in relation to maintaining or improving our essential wastewater infrastructure is not constrained by the designation. Anglian Water can provide the Council with details of our operational land/landownership for this site to assist with accuracy of the Policies Map and the attributed land designations.</p>	No	Not Answered		A	Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:	Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:	Y - Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:
1011	Organisation	Tessa	Saunders	Anglian Water	Yes	Policies Map	Yes		No	Justified	Our landownership for Canvey Island WRC extends further than shown on the Policies	Anglian Water requests that the Policies Map	No	Not Answered		A	Anglian Water landownership for Canvey	Modification: Policies Map to be modified in	Y Modification: Policies

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3-0014				Services Ltd							Map, which currently shows our WRC excluded from the designations. However, our landownership for the site includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.	excludes the entirety of our WRC operational land from the land indicated as 'Green Lung' and Park Homes to ensure that any operational or engineering works required in relation to maintaining or improving essential wastewater infrastructure is not constrained by the designation of the 'Green Lung'. Anglian Water can provide the Council with details of our operational land/landownership for this site to assist with accuracy of the Policies Map and the attributed land designations.					Island WRC extends further than shown on the Policies Map, which currently shows our WRC excluded from the designations. However, our landownership for the site includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.	accordance with Anglian Water operational land/landownership mapping, as illustrated on the Schedule of Mods and the Anglian Water Statement of Common Ground.	Map to be modified in accordance with Anglian Water operational land/landownership mapping, as illustrated on the Schedule of Mods and the Anglian Water Statement of Common Ground.

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02820076	Organisation	Kevin	Fraser	Essex County Council	Yes	Policies Map	Not Stated		No	Effective, Consistent with National Policy	Policy GB1, Criteria 1 states that the Green Belt boundaries are defined on the Policies Map and that development within the Green Belt will not be supported in line with the NPPF. ECC requires that school sites are removed from the Green Belt, where appropriate to enable any future school expansion necessary to meet pupil demand not being required to demonstrate an 'exceptional circumstance' to development in the Green Belt. Any school sites removed from the Green Belt should then be allocated as education land on the Policies Map. Paragraph 43 of the Inspectors Report to the 'withdrawn' Local Plan stated there were exceptional circumstances for the removal of Glenwood School site and the land at the Cornelius Vermuyden School from the Green Belt given the extent to which they are built up, and that it was unnecessary to keep these sites permanently open. Similarly, the built-up areas of the USP Canvey College Campus and the former Castle View School; Deanes School and Virgin Active, Hadleigh; and the King John School, Benfleet were recommended to be removed from the Green Belt but there were not exceptional circumstances for the removal of the	ECC supports the recommendations of the Inspector into the 'withdrawn' Local Plan and the recommendations of the Green Belt Assessment, Schools in the Green Belt. ECC seek: <ul style="list-style-type: none"> the General Boundary Issues, paragraph 17.9 be amended to provide commentary with regards the status of these school sites and the Green Belt the Policies Map is amended to identify existing education sites the Policies Map is amended to identify any additional education sites once a cumulative assessment of the growth in the Plan is undertaken (see response to Policy Infra2 – Education, Skills and Learning, paragraph 19.20) ECC require the Mineral 	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Considers that existing and potential new schools, if required to meet growth in the plan, should not be considered as an "exceptional circumstance" to development in Green Belt to allow them to expand to meet pupil demand if required. ECC accepts that there were not exceptional circumstances for the removal of the playing fields associated with these schools from the Green Belt. This was accepted in the previous withdrawn plan by its Inspector and is further highlighted in the CPBC Green Belt Assessment, paragraph 3.3.5. These sites should be removed from the Green Belt on the Policies Map. Request these existing school sites are	Not accepted. The Castle Point Plan is a new plan and has been prepared in different circumstances to the previous withdrawn plan. The new plan proposes a new housing strategy of urban intensification consequently the Green Belt becomes more significant as the Green Belt tightly bounds the existing urban areas and there is limited green space in Castle Point. As all these sites are within designated Green Belt, the Council considers that further development of these sites is not acceptable. Accepted and Maps updated with information. Accepted and maps updated	Add Mineral Safeguarding Areas to Policy Map Remove school playing fields from open space designation Add existing 'Educational Establishments' to the Policies Map

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											<p>playing fields associated with these schools. This was confirmed in Main Modification 67 which identified the sites to be removed from the Green Belt and the boundaries re-aligned appropriately. These school sites were:</p> <ul style="list-style-type: none"> • King John School, Benfleet; • The Deanes School, Benfleet; • Glenwood School, Benfleet; • Kents Hill Infants and Junior School, Benfleet; • Holy Family Catholic Primary School, Benfleet; • Robert Drake Primary School, Benfleet; • Canvey Skills Campus / Procat, Canvey Island; and • Cornelius Vermuyden, Canvey Island. <p>This approach is further supported by the Green Belt Assessment, Schools in the Green Belt, paragraph 3.3.5 which provides support for the conclusions of the examining Inspector of the Borough's previous and withdrawn Local Plan. The Inspectors Report recommended that the Policies Map be amended accordingly. The scale of the Policies Map does not provide the certainty to ECC that these sites have been removed from the Green Belt.</p> <p>The Policies Map should also annotate land that is allocated for educational use to enable and strengthen the</p>	Safeguarding Areas are identified on the Policies Map. ECC require reference to school playing fields being defined as public open space on the Policies Map should be deleted.					allocated as education land on the policies map to strengthen the implementation of Policy Infra2.		Require that Mineral Safeguarding Areas are identified on the Policies Map.		

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											<p>implementation of Policy Infra2, which seeks to protect and/or enable the re-use of educational establishments where ECC has indicated they are surplus to educational requirements. The Policies Map should also be amended to allocate any additional education sites once a further cumulative assessment of the growth in the Plan has been undertaken.</p> <p>ECC note that MSAs are not identified on the Policies Map on page 194 of the Plan.</p> <p>Planning Policy Guidance (PPG), section 27 defines the role that planning authorities have in safeguarding mineral resources, stating that district councils should show Mineral Safeguarding Areas (MSAs) on their policy maps (PPG Reference ID 27-005-20140306).</p> <p>This is to ensure that known locations of specific minerals are not needlessly sterilised by other forms of development, whilst not creating a presumption that the defined resources will ever be worked.</p> <p>ECC requires the Policies Map to be amended to remove the designation of school playing fields as public open space. School playing fields are not considered public open space in the same way as parks or village</p>									

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											greens. While some schools may allow community access to their playing fields, they are primarily intended for the physical education and recreation of the students who attend the school. Government guidance on school land says that school playing fields are provided for the benefit of pupils and their enjoyment, and any community use is usually at the school's discretion. There is a strong policy presumption against the disposal or change of use of school playing field land, and the Secretary of State's prior consent is needed for any such action.									
10120004	Agent	Arun	Sriskanda	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	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.	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	

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											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' 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.						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' 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 to match the 'on the ground' 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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																	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.		
101200110	Agent	Arun	Srisanda	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	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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																	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.		
10020005	Agent	Nik	Smith	The Salvation Army c/o Nexus Planning	Yes	Policies Map	No	The Regulation 19 consultation has not been undertaken properly, with two materially different versions of the Local Plan on the Council's website, and importa	No	Positively prepared		5.4 With regard the Draft Policies Map, we have the following additional observations: -The location of the listed, and locally listed buildings are not accurate. -The key is not accurate for the Hadleigh Country Park, Hadleigh Farm, and Benfleet Southend Marches. Diagonal on the key but hatched on the plan. -Scheduled ancient	Not Answered	Not Answered	Yes		Error in public consultation With regard the Draft Policies Map, we have the following additional observations: -The location of the listed, and locally listed buildings are not accurate. -The key is not accurate for the Hadleigh Country Park, Hadleigh Farm, and Benfleet Southend Marches. Diagonal on the key but hatched	Acknowledged by the council and a second regulation 19 consultation was undertaken to address this issue. The data used for the policies map was sourced from Historic England and Essex County Council. A general review of the styling of the map has been added to the mods list.	N

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								nt documents added to the document library midway through the consultation period.				monument key does not match the colour on the plan. Beige on key, and red on plan.					on the plan. -Scheduled ancient monument key does not match the colour on the plan. Beige on key, and red on plan.		
10560001	Agent	.	.	Thorney Bay Park Limited c/o Laister Planning Limited	Yes	Policies Map	No	The Local Plan proposes to designate the south-western corner of Thorney Bay/Sandy Bay Caravan Park for both 'Park Homes' and 'Green Lung'. As set out in our letter submitted to these representations, the land has been	No	Effective, Justified	As set out above, the Proposals Map seeks to designate the south-western part of Sandy Bay/Thorney Bay Caravan Park as both a 'Green Lung' and 'Park Homes'. its long standing use is for caravan site (static caravans) and purposes ancillary to the use of the site as a caravan site. The 'Green Lung' designation is incompatible with that long-standing use and therefore the Proposals Map is both unjustified and ineffective, and therefore unsound. To correct it, the 'Green Lung' designation should be removed from this part of the caravan park, and this land should only be designated 'Park Homes' alongside the wider caravan site.	As set out above, the Proposals Map seeks to designate the south-western part of Sandy Bay/Thorney Bay Caravan Park as both a 'Green Lung' and 'Park Homes'. its long standing use is for caravan site (static caravans) and purposes ancillary to the use of the site as a caravan site. The 'Green Lung' designation is incompatible with that long-standing use and therefore the Proposals Map is both unjustified and ineffective, and therefore unsound. To correct it, the 'Green Lung' designation should be	No	Not Answered	Yes	C	Remove the green lung designation from the south-western part of Sandy Bay/Thorney Bay Caravan Park.	This designation is considered necessary to safeguard the strategically important ecological corridor.	N

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								used for the stationing of static caravans or ancillary purposes associated with the caravan site for almost twenty years. It serves no purpose as a 'Green Lung' as it contains static caravans and maintenance yard. The Proposal's Map should be updated accordingly to remove the 'Green Lung' designation and retain				removed from this part of the caravan park, and this land should only be designated 'Park Homes' alongside the wider caravan site								

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								the 'Park Homes' designation only. Otherwise, the Local Plan is unjustified and ineffective - and therefore 'unsound' - without further amendment.											
02820058	Organisation	Kevin	Fraser	Essex County Council	Yes	Policy T5 - Highway Impact, paragraph 20.55, Page 166	Not Stated		No	Effective	ECC welcome reference in criteria 1 to developers being required to prepare a Transport Assessment or Transport Statement, and a Travel Plan, having regard to the thresholds published by the local Highway and Transportation Authority. However, ECC seek clarification to paragraph 20.55 which implies that all development, irrespective of scale, that generate significant movements will be required to produce a Travel Plan. As set out in the Developers' Guide (September 2025) developments comprising of 80 or more dwellings are required to prepare a Travel Plan setting out information set out in paragraph 20.55. Smaller developments may require a Travel Plan, if there	ECC require paragraph 20.55 is amended to read: developments that generate significant amounts of movement may be required to produce a Travel Plan having regard to the thresholds in Essex County Council published guidance.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports the requirement for all development which are likely to impact the transport networks to provide Transport Assessments/Statements and a Travel Plan	Accepted. CPBC agrees that any development which impacts the transport network should prepare transport assessments and travel plans to assess their impacts.	

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											are concerns around pollution, congestion, and pressures on the existing road network.								
0340002	Individual	Warren	Smith	G&K Ground works		Procedural matters		Re The housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the stateme								B	Procedural matters Re The Housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the statement of common ground, is entitled "Regulation 19 Pre-Submission Draft" it is clearly not a document that was produced pre the Reg 19 approval! The Reg 19 consultation closed on 26th Sept 2025, this	Noted	N

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02190002	Individual	Graham	Bracci		Yes	SD1	Yes	CPBC Plan Page 170 6.01 In the further interest of public safety, there needs to be a realisation that Canvey Island is at risk of being inundated by the sea. Subsequently there needs to be a "Flood Risk Consequence Analysis" undertaken that evaluates the consequences, on the population living and working at or below sea	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area's objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process		C	The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequence based analysis for vulnerable populations.	Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location, site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies

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								level, following a major breach, or over-topping of its Sea Defences. 6.02 Policy SD1 rightly identifies Canvey Island as being at high risk of tidal flooding and sets out principles to avoid development in Flood Zone 3. However, Policy C4 proposes considerable development in West Canvey, which lies within this zone. This contradi			for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation .										(including EA, Essex LLFA).'

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								ction undermines the credibility of the Plan and raises concerns about the safety and sustainability of future development 6.03 Castle Point Borough Council continues to wrongly report / imply that the funding for Canvey Island's Sea defence improvements has been secured. The Environment Agency via, its TE2100 plan, aspires			Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan's ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This										

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								to maintain and improve the present level of protection, in respect of rise in sea levels consistent with global warming predictions. However, the Environment Agency strongly emphasises that such improvements are subjected to funding and cost effectiveness. Without such improvements Canvey Island may become			is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively											

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								provide Space for Water, and in the event of a Tidal Breach to											

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0220002	Individual	Steve	Sawkins		Yes	SD1		CPBC Plan Page 170 6.01 In the further interest of public safety, there needs to be a realisation that Canvey Island is at risk of being inundated by the sea. Subsequently there needs to be a "Flood Risk Consequence Analysis" undertaken that evaluates the consequences, on the population living and working at or below sea	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area's objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EIP) process		C	The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequence based analysis for vulnerable populations.	Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location, site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies

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								of injuries 15 In doing so assisting CPBC with the undertaking of the duties placed upon them via the Civil Contingency Act. 6.08 Regarding Canvey Island's Green Belt and Green Field spaces, we consider these areas valuable and essential assets when considering Flood Risk, whether from Tidal or Surface Water sources. Their ability to											

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								provide Space for Water, and in the event of a Tidal Breach to											
1013-0009	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD1	Yes		Yes		NOTE: It is noted that the regeneration and redevelopment of brownfield sites on Canvey Island (Flood Zone 3a) will have to meet the Sequential Test and where appropriate the Exceptions Test. Whilst the measures in the policy are to ensure that new development is designed to be flood resistant and resilient, the supporting infrastructure, such as sewerage infrastructure, is likely to require significant investment and capital carbon		No	Not Answered		A	NOTE: It is noted that the regeneration and redevelopment of brownfield sites on Canvey Island (Flood Zone 3a) will have to meet the Sequential Test and where appropriate the Exceptions Test. Whilst the measures in the	Noted	N

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											in new infrastructure and ongoing maintenance, but will undoubtedly be at a much higher risk from the impacts of tidal flooding due to the fact our infrastructure is underground, and vulnerable to flood events.						policy are to ensure that new development is designed to be flood resistant and resilient, the supporting infrastructure, such as sewerage infrastructure, is likely to require significant investment and capital carbon in new infrastructure and ongoing maintenance, but will undoubtedly be at a much higher risk from the impacts of tidal flooding due to the fact our infrastructure is underground, and vulnerable to flood events		

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0823-0015	Organisation	Pat	Abbot	Environment Agency	Yes	SD1	Yes		Yes		<p>Please note that there is an error within the published consultation document, in part 1.b. of Policy SD1 which incorrectly states “floor” and which should read “flood”</p> <p>Whilst we are supportive of this section, we would suggest that the wording of part 1.b. is slightly amended to read “New bungalows and other forms of self-contained residential accommodation at ground level, including extensions and annexes, will be refused on Canvey Island unless an internally accessible and suitably designed place of refuge above the predicted flood levels can be provided within the development.....”</p> <p>We strongly support the Council’s inclusion of a 19m land safeguarding buffer on the landward side of the existing tidal flood defences which respects the policy guidance given in paragraph 172(b) of the NPPF which states that all plans should safeguard land from development that is required, or likely to be required, for current or future flood management and reflects the guidance given by Recommendation 5-6 of the Castle Point Level 1 SFRA. This will help to achieve Outcome 12 of the TE2100 Plan https://www.gov.uk/guidance/what-needs-to-be-done-across-the-estuary-</p>	<p>Please note that there is an error within the published consultation document, in part 1.b. of Policy SD1 which incorrectly states “floor” and which should read “flood”</p> <p>Whilst we are supportive of this section, we would suggest that the wording of part 1.b. is slightly amended to read “New bungalows and other forms of self-contained residential accommodation at ground level, including extensions and annexes, will be refused on Canvey Island unless an internally accessible and suitably designed place of refuge above the predicted flood levels can be provided within the development.....”</p> <p>We strongly support the Council’s</p>	No	Not Answered		A	<p>Supports policy SD1 but suggests some amendments including:</p> <p>part 1.b. of Policy SD1 which incorrectly states “floor” and which should read “flood”</p> <p>part 1.b. is slightly amended to read “New bungalows and other forms of self-contained residential accommodation at ground level, including extensions and annexes, will be refused on Canvey Island unless an internally accessible and suitably designed place of refuge above the predicted flood levels can be provided within the development... ..”</p> <p>Paragraph 21.15 - We welcome the inclusion in the reasoned</p>	Support noted, see proposed modifications	1b. New bungalows and other forms of self-contained residential accommodation at ground level including extensions and annexes , will be refused on Canvey Island unless an internally accessible and suitably sized and designed place of refuge above the predicted flood floor levels can be provided within the development, and favourable consideration will be given to the conversion of bungalows to houses, subject to those

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											<p>outcomes-thames-estuary-2100#outcome-twelve to deliver the TE2100 Policy 4 (P4) – take further action to keep up with climate and land use change so that flood risk does not increase which has been set for Canvey Island https://www.gov.uk/guidance/managing-future-flood-risk-and-thames-barrier-thames-estuary-2100#flood-policies and https://www.gov.uk/guidance/canvey-island-policy-unit-thames-estuary-2100 Paragraph 21.15 - We welcome the inclusion in the reasoned justification, that developers should discuss developments with the Environment Agency at the earliest opportunity when their proposals are sited close to flood defences. We would also welcome discussions regarding the Riverside Strategy where appropriate and this could be added to the current text.</p> <p>Paragraph 21.13 – this wording should be amended to read “The Council will work with the Environment Agency to ensure that these ongoing improvements are planned, receive full funding from relevant sources and delivered.” Which would reflect the wording contained in Strategic Policy SP4 Development Contributions Paragraph 21.14 – Whilst we agree with the wording of the this paragraph in the reasoned justification we would suggest</p>	<p>inclusion of a 19m land safeguarding buffer on the landward side of the existing tidal flood defences which respects the policy guidance given in paragraph 172(b) of the NPPF which states that all plans should safeguard land from development that is required, or likely to be required, for current or future flood management and reflects the guidance given by Recommendation 5-6 of the Castle Point Level 1 SFRA. This will help to achieve Outcome 12 of the TE2100 Plan https://www.gov.uk/guidance/what-needs-to-be-done-across-the-estuary-outcomes-thames-estuary-2100#outcome-twelve to deliver the TE2100 Policy 4 (P4) – take further action to keep up with climate and land</p>				<p>justification, that developers should discuss developments with the Environment Agency at the earliest opportunity when their proposals are sited close to flood defences. We would also welcome discussions regarding the Riverside Strategy where appropriate and this could be added to the current text.</p> <p>Paragraph 21.13 – this wording should be amended to read “The Council will work with the Environment Agency to ensure that these ongoing improvements are planned, receive full funding from relevant sources and delivered.” Which would reflect the wording contained in Strategic Policy</p>		<p>privacy, amenity and urban design considerations set out in the Castle Point Design Code;</p> <p>21.13 The TE2100 Plan, prepared by the Environment Agency and partners, sets out a policy for the maintenance and improvement of the sea defences on Canvey Island in line with climate change projections . Improvements have already been delivered to the Island’s southern revetments and will be</p>	

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											<p>a change to the last sentence from 'The Environment Agency has advised that a 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose' to read "The Environment Agency has advised that a minimum 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose".</p>	<p>use change so that flood risk does not increase which has been set for Canvey Island https://www.gov.uk/guidance/managing-future-flood-risk-and-thames-barrier-thames-estuary-2100#flood-policies and https://www.gov.uk/guidance/canvey-island-policy-unit-thames-estuary-2100</p> <p>Paragraph 21.15 - We welcome the inclusion in the reasoned justification, that developers should discuss developments with the Environment Agency at the earliest opportunity when their proposals are sited close to flood defences. We would also welcome discussions regarding the Riverside Strategy where appropriate and this could be added to the current text.</p>					<p>SP4 Development Contributions</p> <p>Paragraph 21.14 – Whilst we agree with the wording of the this paragraph in the reasoned justification we would suggest a change to the last sentence from 'The Environment Agency has advised that a 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose' to read "The Environment Agency has advised that a minimum 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose".</p>		<p>required over the next 40 years to keep up with climate change. The Council will work with the Environment Agency to ensure that these ongoing improvements are planned, receive full funding from relevant sources and are delivered. Any works to retain or enhance sea walls, or within the 19m safeguarded buffer zone, should avoid causing adverse effects on site integrity. This will need to be demonstrated through</p>

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												<p>Paragraph 21.13 – this wording should be amended to read “The Council will work with the Environment Agency to ensure that these ongoing improvements are planned, receive full funding from relevant sources and delivered.” Which would reflect the wording contained in Strategic Policy SP4 Development Contributions</p> <p>Paragraph 21.14 – Whilst we agree with the wording of the this paragraph in the reasoned justification we would suggest a change to the last sentence from ‘The Environment Agency has advised that a 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose’ to</p>								<p>a project level HRA.</p> <p>21.15 Developers are encouraged to enter into discussions with the Environment Agency at a very early stage when formulating development proposals close to or within the safeguarded sea defence area and where appropriate The Riverside Strategy. Flood Risk Activity Permits were introduced under the Environmental Permitting (England and Wales) (Amendment) (No.2) Regulations in April 2016. Early</p>

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												read "The Environment Agency has advised that a minimum 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose".								discussions with the Environment Agency will avoid the potential for costly development design and layout revisions or to avoid the risk of having a flood risk permit application refused by the Environment Agency. Flood Risk Activity Permits are separate to the planning application process and are required by the Environment Agency for certain activities within set distances from tidal defences – further guidance is set out by the Environment Agency.

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																			21.14 The current preferred tidal flood risk management policy for the tidal defences within the TE2100 Plan's Canvey Island policy unit is to take further action to keep up with climate and land use change so that flood risk does not increase. In order to help deliver the TE2100 Plan's aspirations for the Canvey Island policy unit, it is necessary for land adjacent to tidal defences to be left free from development as far as

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																			possible. This is to provide the space for the permanent footprint required of larger defences. Accessibility is also essential in delivering such improvements (both for facilitating the construction of new defences as well as for vehicular access (4x4 or construction plant) to maintain and inspect and repair the defences over their lifetime). The Environment Agency has advised that a minimum 19m buffer, as measured

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																				from the landward edge of the current sea defence structure, should be left free from development for this purpose.
02820065	Organisation	Kevin	Fraser	Essex County Council	Yes	SD1	Not Stated		Yes		The refusal of new bungalows or other self-contained ground floor residential accommodation (without appropriate refuge) in Criteria 1b is welcomed ECC welcome reference in criteria 4 to a 19m wide buffer of land adjacent to the existing flood defences on Canvey Island, as shown on the Policies Map, to safeguarded for future flood defence works, landscaping, environmental enhancements and amenity.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Welcomes the restriction on new bungalows or ground floor residential accommodation on Canvey Island due to tidal flood risk. Welcomes 19m wide land buffer to existing flood defences on Canvey Island is safeguarded should any future flood defence work required.	Noted Noted	6. Development proposals must ensure that habitats sites are not adversely effected and be in accordance with Policy ENV2 – Coastal & Riverside Strategy.	

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02820066	Organisation	Kevin	Fraser	Essex County Council	Yes	SD1	Not Stated		No	Effective	ECC seek criteria 6 requires new development to also be in accordance with Policy ENV2 – Coastal & Riverside Strategy to ensure the wider environment and issues are considered regarding any development proposals.	ECC require Criteria 6 is amended to read: Development proposals must ensure that habitats sites are not adversely effected and be in accordance with Policy ENV2 – Coastal & Riverside Strategy	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Additional text to align policy with ENV 2 to ensure that Habitat sites are not adversely impacted in accordance with ENV2	Accepted and text amended.	
03410019	Organisation	Jane	Nuttall	Natural England		SD1	Yes	Natural England wishes to remind Castle Point that any flood risk projects which have the potential to impact SPA features will require an HRA to ensure that they do not damage designated features or impact	Yes							A	Natural England wishes to remind Castle Point that any flood risk projects which have the potential to impact SPA features will require an HRA to ensure that they do not damage designated features or impact SSSI species and habitats. We note the risks to biodiversity and ecology from climate change are identified in section 21.3 and welcome efforts to manage these impacts. Section 21.18 identifies the potential for intertidal	<u>Modification: Paragraph 21.18</u> Local Plan 21.18 The loss of inter-tidal marshland habitats. The Benfleet and Southend Marshes is designated as a Special Protection Area (SPA) and is recognised for its assemblage of migratory birds under the Ramsar Convention. As a consequence, there is a need to identify compensatory habitat. The TE2100 Plan seeks to identify compensatory	<u>Modification: Paragraph 21.18</u> Local Plan 21.18 The loss of inter-tidal marshland habitats. The Benfleet and Southend Marshes is designated as a Special Protection Area (SPA) and is recognised for its

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								SSSI species and habitats. We note the risks to biodiversity and ecology from climate change are identified in section 21.3 and welcome efforts to manage these impacts. Section 21.18 identifies the potential for intertidal marshland habitat loss that may require compensatory measures. Natural England would like to be consulted at the									marshland habitat loss that may require compensatory measures. Natural England would like to be consulted at the earliest stage to ensure that any compensatory measures are sufficient. We also encourage Castle Point to identify compensatory sites early as there are high levels of competition for suitable sites in and around the Thames estuary. Ideally, we would rather flood management measures avoid the loss of designated habitat entirely, but Natural England recognise that this may not be feasible given the local area. It may be necessary to explore habitat creation options as a compensatory measure and there will need	provision to account for this loss. Natural England's early input will be sought to ensure that any compensatory measures are sufficient. Habitats created as compensatory measures will require a robust long-term monitoring programme to ensure continued functionality. Any development within Hadleigh Marshes should avoid causing adverse effects on sites integrity. This will need to be demonstrated through a project level Habitats Regulations Assessment.	assemblage of migratory birds under the Ramsar Convention. As a consequence, there is a need to identify compensatory habitat. The TE2100 Plan seeks to identify compensatory provision to account for this loss. Natural England's early input will be sought to ensure that any compensatory measures are sufficient. Habitats created

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								earliest stage to ensure that any compensatory measures are sufficient. We also encourage Castle Point to identify compensatory sites early as there are high levels of competition for suitable sites in and around the Thames estuary. Ideally, we would rather flood management measures avoid the loss of designated habitat entirely,									to be a comprehensive plan for any such proposals including a robust long-term monitoring programme to ensure that compensatory measures are functioning effectively. Note: Similar comments were also made by NE in their response to the HRA		as compensatory measures will require a robust long-term monitoring programme to ensure continued functionality. Any development within Hadleigh Marshes should avoid causing adverse effects on sites integrity. This will need to be demonstrated through a project level Habitats Regulations Assessment.

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								but Natural England recognise that this may not be feasible given the local area. It may be necessary to explore habitat creation options as a compensatory measure and there will need to be a comprehensive plan for any such proposals including a robust long-term monitoring programme to ensure that compensatory measures are											

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								functioning effectively.											
10120005	Agent	Arun	Sriskanda	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,	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	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	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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											<p>environmental enhancements and amenity measures in addition to flood defence works.</p> <p>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.</p> <p>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-case basis and that agreement on the acceptability or otherwise of a proposed development would be determined through the</p>	kept free from development.					<p>significant Oikos facility.</p> <p>f it is considered necessary for Policy SD1 criterion 4 to be included, then this needs to be redrafted along the following lines</p> <p>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.</p>		

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											<p>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.</p> <p>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 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.</p>												

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0320010	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
1440016	Organisation	Joseph	Beale	RSPB	Yes	SD1	Yes		No	Justified	Given the great importance of the Essex Coast to birds, and other wildlife, including as part of the East Atlantic Flyway, the use of Beneficial Use of Dredged Sediment (BUDS) should be included in this section as an alternative to hard sea defences where possible. BUDS could also be used to protect and enhance existing coastal habitat such as saltmarsh as they have done in the Blackwater Estuary. Recharging Canvey Point would be an option. Even offshore recharges could be an option to reduce the impact of tidal surges. These islands would simultaneously deliver for nature conservation as breeding/roosting islands for	Given the great importance of the Essex Coast to birds, and other wildlife, including as part of the East Atlantic Flyway, Beneficial Use of Dredged Sediment (BUDS) should be mentioned in this Policy as an alternative to hard sea defences where possible. BUDS could also be mentioned as an option to protect and enhance existing coastal habitat such as	No				Given the great importance of the Essex Coast to birds, and other wildlife, including as part of the East Atlantic Flyway, the use of Beneficial Use of Dredged Sediment (BUDS) should be included in this section as an alternative to hard sea defences where possible. BUDS could also be used to protect and enhance existing coastal habitat such as saltmarsh as	Noted	N

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											<p>shorebirds. Page 172. There should be mention of working with the EA to understand/ensure the future of the two tidal flood barriers at Benfleet and East Haven Creeks, which are vital protection for the island.</p>	<p>saltmarsh, as they have done in the Blackwater Estuary, with recharging and offshore recharging options to consider. Page 172. There should be mention of working with the EA to understand/ensure the future of the two tidal flood barriers at Benfleet and East Haven Creeks. These are vital protection for the island, yet not mentioned specifically</p>					they have done in the Blackwater Estuary. Recharging Canvey Point would be an option. Even offshore recharges could be an option to reduce the impact of tidal surges. These islands would simultaneously deliver for nature conservation as breeding/roosting islands for shorebirds. Page 172. There should be mention of working with the EA to understand/ensure the future of the two tidal flood barriers at Benfleet and East Haven Creeks, which are vital protection for the island.		
0354003	Organisation	Mark	Sheppard	Southend City Council		SD1	Yes	The London Fenchurch Street to Shoeburyness railway line is a key transport	Yes							A	The London Fenchurch Street to Shoeburyness railway line is a key transport route for Southend residents to access jobs and leisure	Noted	N

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								t route for Southend residents to access jobs and leisure opportunities. We will continue to work in collaboration with Castle Point Borough Council, the Environment Agency and transport agencies to manage flood risk and build in long-term resilience for the railway line.									opportunities. We will continue to work in collaboration with Castle Point Borough Council, the Environment Agency and transport agencies to manage flood risk and build in long-term resilience for the railway line.		
1431-00	Individual	Sharon	Oneill		Yes	SD1	No	When was the relevant flood study done	No	Consistent with National Policy		More studies to be done on infrastructure drains roads and flooding risks	No				More studies to be done on infrastructure drains roads and flooding risks	Infrastructure: Infrastructure matters are covered by policies INFRA1-6 and the supporting	N

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01								this area is prone to flooding and 3000+ houses are to be built here										Infrastructure Delivery Plan (IDP). Flooding: Flood risk covered in policies SD1-3 and the supporting Strategic Flood Risk Assessment (SFRA).	
1448-0003	Organisation	David	Barton	Traditional Vernacular Architecture	Not Stated	SD1	Not Stated		Not Stated		Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.		Not Stated	Not Stated	Not Stated		Flooding hotspots should be identified for emergency grant funding, with regional cooperation to prevent recurrent repairs.	Noted	N
1013-0010	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD2	Yes		Yes		NOTE: Whilst Anglian Water is a Risk Management Authority in terms of managing flood risks from our infrastructure, we also need to be cognisant of the impacts of new development and other forms of flood risk, such as surface water and groundwater flooding, on the resilience of our sewerage infrastructure, given our duty to ensure the area we serve is 'effectively drained'. We support the requirement for all development to integrate SuDS to contribute to the management of surface water flood risk - however this is contradicted in Policy SD3 by applying to all 'major' development (see our representation to Policy SD3). Supporting infrastructure for		No	Not Answered		A	NOTE: Whilst Anglian Water is a Risk Management Authority in terms of managing flood risks from our infrastructure, we also need to be cognisant of the impacts of new development and other forms of flood risk, such as surface water and groundwater flooding, on the resilience of our sewerage infrastructure, given our duty to ensure the area	Policy SD2(9) relates to Policy SD3(1). SD3(1) states that 'all new development will be required to incorporate water management measures to reduce surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere'. It further continues that 'The principal method to do so should be the use of Sustainable Drainage Systems (SuDS).'	N

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											new housing and employment growth, such as our sewerage infrastructure, is likely to require significant investment and capital carbon in delivering new infrastructure and ongoing maintenance but will undoubtedly be at a much higher risk from the impacts of surface water flooding due to the fact our infrastructure is underground, and therefore vulnerable to flood events.						we serve is 'effectively drained'. We support the requirement for all development to integrate SuDS to contribute to the management of surface water flood risk - however this is contradicted in Policy SD3 by applying to all 'major' development (see our representation to Policy SD3). Supporting infrastructure for new housing and employment growth, such as our sewerage infrastructure, is likely to require significant investment and capital carbon in delivering new infrastructure and ongoing maintenance but will undoubtedly be at a much higher risk from the impacts of surface water flooding due to the fact our infrastructure is underground, and therefore	It is therefore considered implicit in both SD2 and SD3 that SuDS is required for all development. The reference to 'major' development in the consulted version of Policy SD3 relates to the requirement to submit a full drainage strategy, rather than SuDS.	

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																	vulnerable to flood events.		
08230016	Organisation	Pat	Abbot	Environment Agency	Yes	SD2	Yes		Yes		While we support the inclusion of this Policy, we feel that it could be enhanced by the addition of a point specifying that:- Only essential infrastructure or water compatible types of development will be considered in areas identified by the Castle Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b) The Reasoned Justification could refer to Recommendation 5-7 of the Level 1 SFRA which includes text on how applications for redevelopment of previously developed sites located within mapped areas of Functional Floodplain would be considered.	While we support the inclusion of this Policy, we feel that it could be enhanced by the addition of a point specifying that:- Only essential infrastructure or water compatible types of development will be considered in areas identified by the Castle Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b) The Reasoned Justification could refer to Recommendation 5-7 of the Level 1 SFRA which includes text on how applications for redevelopment of previously developed sites located within mapped areas of Functional	No	Not Answered		A	Support policy SD2 but suggest the following: Only essential infrastructure or water compatible types of development will be considered in areas identified by the Castle Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b) The Reasoned Justification could refer to Recommendation 5-7 of the Level 1 SFRA which includes text on how applications for redevelopment of previously developed sites located within mapped areas of Functional Floodplain would be considered.	Support noted, see proposed modifications	2. Only essential infrastructure or water compatible types of development will be supported in areas identified by the Castle Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b), subject to compliance with all other relevant policies of this Plan. 21.28 Recommendation of the Level 1 SFRA which includes text on how applications for

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												Floodplain would be considered.								redevelopment of previously developed sites located within mapped areas of Functional Floodplain would be considered. In terms of fluvial flooding, the SFRA 2024 identifies the Prittle Brook and Benfleet Hall Sewer, as being sources of fluvial flood risk. Fluvial flooding is also possible from the watercourses and dykes that form the drainage system on Canvey Island, due to the flat and low-lying topography of the island and the finite capacity of

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																			the culverted sections of the drainage infrastructure. Some of this network drains to tide via flapped outfalls which only operate at low-tide. If water were to overtop these dykes, the flat topography of the Borough could cause it to disperse over large areas.

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0282-0067	Organisation	Kevin	Fraser	Essex County Council	Yes	SD2	Not Stated		No	Effective	To ensure consistency with Policy SD3, criteria 2 reference should be made to a drainage strategy being required where development is located within an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area. NPPF paragraph 182 states that where surface water flooding is a known issue, which includes Critical Drainage Areas, policies should encourage development to provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity in collaboration with the Lead Local Flood Authority, namely ECC. This approach supports betterment by turning flood risk mitigation into an opportunity for placemaking, green infrastructure and community resilience. This will be influenced by the preparation of a drainage strategy which should comply with the Sustainable Drainage Systems Guide for Essex. NPPF paragraph 182 states that where surface water flooding is a known issue, which includes Critical Drainage Areas, policies should encourage development to provide multifunctional benefits wherever possible, through facilitating improvements in water quality and	ECC require Criteria 6 is amended to read: Where a development proposal is for a site in an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area, a drainage strategy will be required to demonstrate how both on and off-site flood risk will be managed and mitigation measures should be satisfactorily integrated into the design and layout of the development to provide betterment to the community by reducing flood risk. Any natural or semi-natural water features such as ditches, dykes and ponds must be retained in their natural or semi-natural form to maintain existing attenuation provision and existing flow paths. ECC require paragraph 21.28	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Additional text stating that a drainage strategy should be required within areas at risk of fluvial or surface water flooding or within a Critical Drainage Area. Development in areas of surface water flooding should provide a drainage strategy which designs in multifunctional benefits including improvements in water quality biodiversity and amenity.	Accepted and text amended Accepted and text amended	Where a development proposal is for a site in an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area, a drainage strategy will be required to demonstrate how both on and off-site flood risk will be managed, and mitigation measures should be satisfactorily integrated into the design and layout of the development to provide betterment to the community by reducing flood risk. Any natural or semi-natural

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											<p>biodiversity, as well as benefits for amenity in collaboration with the Lead Local Flood Authority, namely ECC. This approach supports betterment by turning flood risk mitigation into an opportunity for placemaking, green infrastructure and community resilience. This will be influenced by the preparation of a drainage strategy which should comply with the Sustainable Drainage Systems Guide for Essex.</p>	<p>is amended to read: ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood and Water Management Map identifies Critical Drainage Areas (CDAs), these are areas, where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. Where a development proposal is within a CDA, a drainage strategy will be required to demonstrate how surface water flooding on site will be managed and how the site will mitigate the risk of increasing flooding downstream. Drainage strategies should comply with the Sustainable Drainage Systems Guide for Essex.</p>									<p>water features such as ditches, dykes and ponds must be retained in their natural or semi-natural form to maintain existing attenuation provision and existing flow paths. ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood and Water Management Map identifies Critical Drainage Areas (CDAs), these are areas, where multiple or interlinked</p>

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												<p>ECC require paragraph 21.28 is amended to read:</p> <p>ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood and Water Management Map identifies Critical Drainage Areas (CDAs), these are areas, where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. Where a development proposal is within a CDA, a drainage strategy will be required to demonstrate how surface water flooding on site will be managed and how the site will mitigate the risk of increasing flooding downstream. Drainage strategies should comply with the Sustainable</p>								sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. Where a development proposal is within a CDA, a drainage strategy will be required to demonstrate how surface water flooding on site will be managed and how the site will mitigate the risk of increasing flooding downstream. Drainage strategies should comply with the Sustainable Drainage Systems Guide for Essex. In particular,

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												<p>Drainage Systems Guide for Essex.</p> <p>In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the 1in1 year greenfield rate for all events up to the 1in100 event plus climate change. Sites should follow the drainage hierarchy and utilise above grounds SuDS where possible, including SuDS for conveyance and they should be included in the landscape strategy.</p> <p>In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the 1in1 year</p>								<p>sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the 1in1 year greenfield rate for all events up to the 1in100 event plus climate change. Sites should follow the drainage hierarchy and utilise above grounds SuDS where possible, including SuDS for conveyance and they should be included in the landscape strategy.</p> <p>There are</p>

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												greenfield rate for all events up to the 1in100 event plus climate change. Sites should follow the drainage hierarchy and utilise above grounds SuDS where possible, including SuDS for conveyance and they should be included in the landscape strategy.								seven identified CDAs in Castle Point covering Most of the Borough's land area. There are as follows....
10270009	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	SD2	Yes		No	Consistent with national policy	Policy SD2 will need to be updated, regarding the sequential test, following the recent update to the PPG (dated 17.09.25).	Policy SD2 will need to be updated, regarding the sequential test, following the recent update to the PPG (dated 17.09.25).	No	Not Answered		A	Policy SD2 will need to be updated, regarding the sequential test, following the recent update to the PPG (dated 17.09.25).	Noted. Statements of Common Ground undertaken with Environment Agency and ECC (Lead Local Flood Authority). The LPA will ask the Examining Inspector to recommend any mods which they believe are necessary for soundness.	N	

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101300111	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD3	Yes		No	Effective	<p>Anglian Water supports the policy requirements for SuDS in principle. Whilst we recognise that the LLFA is a statutory consultee for major planning applications, we would seek drainage strategies to be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. This would be consistent with clause 9 of Policy SD2, and recommendation 5-13 in the SFRA Level 1.</p> <p>Our Surface Water Risk Management Guidance provides comprehensive approach to how we will assess different types of site in terms of surface water connections. https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf</p> <p>For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and require developers to liaise with the Lead Local Flood Authority (LLFA) - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is</p>	<p>We would recommend a policy modification to ensure that drainage strategies will be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network.</p> <p>Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development.</p>	No	Not Answered		A	<p>Anglian Water supports the policy requirements for SuDS in principle. Whilst we recognise that the LLFA is a statutory consultee for major planning applications, we would seek drainage strategies to be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. This would be consistent with clause 9 of Policy SD2, and recommendation 5-13 in the SFRA Level 1. For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has</p>	<p>Modification to policy SD3</p> <p>2. All major qualifying development, will be required to submit a drainage strategy to demonstrate that the surface water hierarchy has been followed, how both on and off-site flood risk will be managed and how mitigation measures should will be satisfactorily integrated into the design and layout of the development.</p> <p><u>New paragraph 21:35</u> Qualifying development is major development (as defined in the GPDO) and minor development which seeks to connect to the public sewerage network.</p> <p><u>Consistency with SFRA recommendation 5.13</u></p> <p>Part 1 of Policy SD3 requires all development to</p>	<p>Y - Modification to policy SD3</p> <p>2. All major qualifying development, will be required to submit a drainage strategy to demonstrate that the surface water hierarchy has been followed, how both on and off-site flood risk will be managed and how mitigation measures should will be satisfactorily integrated into the design and layout of the development.</p> <p><u>New paragraph 21:35</u> Qualifying development is major development</p>

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											<p>feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow.</p> <p>The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.</p> <p>Should network reinforcement be required because of additional surface water flow to an existing public surface water sewer, Anglian Water will request a planning condition to ensure no additional flow will be connected until sufficient capacity in the network has been demonstrated. Reinforcement of the existing network, when required as a consequence of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned</p>							<p>been followed and require developers to liaise with the Lead Local Flood Authority (LLFA) - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow. Anglian Water will request a planning condition to ensure no additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been</p>	<p>reduce surface water run-off which is considered to reflect the SFRA recommendation.</p>	<p>nt (as defined in the GPDO) and minor development which seeks to connect to the public sewerage network.</p> <p><u>Consistency with SFRA recommendation 5.13</u></p> <p>Part 1 of Policy SD3 requires all development to reduce surface water run-off which is considered to reflect the SFRA recommendation.</p>

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											<p>under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water Industry Act 1991, with the capital cost fully chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement.</p> <p>Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development. We agree that no developments should connect surface water discharge to the foul network. Our surface water networks are designed for the existing catchment; therefore it is assumed to have minimal residual capacity for additional flow. Once approval in principle has been reached with LLFA, detailed analysis can be undertaken to establish the receiving surface water network capacity. Detailed analysis will be required to establish whether there is existing capacity to accommodate the proposed connection and if not, to advise on the extent of network reinforcement required. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to</p>						<p>demonstrated. Should network reinforcement be required because of additional surface water flow to an existing public surface water sewer, Anglian Water will request a planning condition to ensure no additional flow will be connected until sufficient capacity in the network has been demonstrated. Reinforcement of the existing network, when required as a consequence of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water</p>		

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											<p>determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water</p> <p>21.37 Anglian Water supports the link between SuDS and water efficiency measures through rainwater harvesting and reuse. Anglian Water works with a wide range of partners through the Ofwat Innovation Fund project - Enabling Water Smart Communities, which provides useful information on opportunities for integrated water management including water reuse in new developments.</p>							<p>Industry Act 1991, with the capital cost fully chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement. Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development. We agree that no developments should connect surface water discharge to the foul network. Our surface water networks are designed for the existing catchment; therefore it is assumed to have minimal residual capacity for additional flow. Once approval in principle has been reached with LLFA,</p>		

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																	<p>detailed analysis can be undertaken to establish the receiving surface water network capacity. Detailed analysis will be required to establish whether there is existing capacity to accommodate the proposed connection and if not, to advise on the extent of network reinforcement required. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost.</p> <p>Anglian Water. Anglian Water</p>		

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																	supports the link between SuDS and water efficiency measures through rainwater harvesting and reuse. Anglian Water works with a wide range of partners through the Ofwat Innovation Fund project - Enabling Water Smart Communities, which provides useful information on opportunities for integrated water management including water reuse in new developments.		
0823-0017	Organisation	Pat	Abbot	Environment Agency	Yes	SD3	Yes		Yes		We welcome the inclusion of policy SD3 regarding SuDS. We feel the policy distinguishes the increased risk between shallow and deep infiltration systems. For the benefit of applicants, we recommend that the following guidance is also referenced within this policy: The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; National standards for sustainable drainage systems on gov.uk.	We welcome the inclusion of policy SD3 regarding SuDS. We feel the policy distinguishes the increased risk between shallow and deep infiltration systems. For the benefit of applicants, we recommend that the following guidance is also referenced within this policy: The Environment	No	Not Answered		A	Supports policy SD3 Recommends this guidance be referred to The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; National standards for sustainable drainage	Support noted, see proposed modifications	21.34 Essex County Council has prepared a SuDS Design Guide for Essex. This not only addresses technical requirements for SuDS, but also details how SuDS can be

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												Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; National standards for sustainable drainage systems on gov.uk.					systems on gov.uk.		integrated into the design and layout of development to offer wider environmental benefits, and form part of the multi-functional green infrastructure provision. The Environment Agency's Approach to Groundwater Protection should also be considered, particularly statements G1 and G9 to G13 and National standards for sustainable drainage systems.

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02820068	Organisation	Kevin	Fraser	Essex County Council	Yes	SD4	Not Stated		No	Justified, Effective	<p>ECC welcomes the inclusion of Policy SD4 which is based on the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero), October 2025, which is based on strong evidence available on the Essex Design Guide.</p> <p>ECC does not support the recommendation of the Sustainability Appraisal (page 611), which states that the cost implications may be significant in comparison to other Development Management policy requirements and design improvements, and potentially significant enough affect viability in some circumstances. The policies are modelled on what would be most feasible for all major building typologies currently brought forward in Essex, which have all been found to be deliverable at minimal cost uplift by the Net Zero Carbon Viability and Toolkit Study that forms part of the Essex evidence base.</p> <p>As these policy standards are deliverable now, it is recommended that the added stipulation in Part A, paragraph 1 that ‘in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation’ be removed. This is not found in the EPOA Planning Policy Statement and would add unnecessary burden on Planning Officers, who will have to follow up on non-</p>	<p>ECC seek Policy SD4 is amended to read:</p> <p>Policy SD4 – Operational Energy and Carbon (Net Zero)</p> <p>ECC seeks the policy is updated to be consistent with the latest model policy draft, which has been enhanced following successful incorporation into recent Local Plans, which have been adopted (Tendring Colchester Borders Garden Community DPD) and been examined at examination to the satisfaction of the Inspector (Uttlesford Local Plan). The updated Policy has been provided to CPBC as part of this response in Appendix 2 ahead of its formal adoption and publishing on the Essex Design Guide in Autumn 2025</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Update the policy to be consistent with the latest model policy draft within the EPOA Planning Policy Statement-Operational Energy and Carbon (Net Zero) (October 2025), which has been enhanced following successful incorporation into recent Local Plans.</p> <p>Requests that the cost implications and impact on viability within the Sustainability Appraisal are reviewed to reflect the evidence from the Net Zero Carbon Viability and Toolkit study which states interventions provide minimal cost uplift.</p> <p>ECC welcome the embedding of the Essex model policies for net zero in the Plan. These will require to be</p>	Accepted and text amended to reflect the recent EPOA Planning Policy Statement and the evidence base Net Zero Carbon Viability and Toolkit Study Accepted and text amended Accepted and typo corrected	<p>A) New build development (residential and non-residential)</p> <p>All new buildings must shall be designed and built to be Net Zero Energy and Carbon in operation at occupation or, in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation . They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use. 3.</p>

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											<p>compliant developments to ensure that they achieve net zero in operation within the five-year window. Achieving net zero in operation during the post-occupancy phase after building completion would also be tantamount to retrofit. It is acknowledged within this Plan that 'retrofitting buildings is more disruptive, costly and time consuming than designing buildings to be net zero carbon in the first place.' (p. 181). To avoid such disruption for residents, this option to achieve the policy within five years should be removed</p> <p>It should be noted that there are already elements of flexibility within the EPOA Planning Policy Statement, without the need for this five-year extension. For example, there is the option to pay into an offsetting fund should the renewable energy demands of Requirement 4 not be met.</p> <p>The EPOA Planning Policy Statement will be further updated in Autumn 2025 and these revisions will also provide more flexibility. The latest version is attached in Appendix 2. These changes are explained in greater detail in the comment for 'p. 179-180, Policy SD4 – Net Zero Carbon Development (In Operation)' and it is encouraged that they be incorporated into Policy SD4. With these provisions for</p>	<p>In addition, ECC require Part A, paragraph 1 is amended to delete 'in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation' to be consistent with the latest EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero), October 2025 in Appendix 2:</p> <p>All new buildings must be designed and built to be Net Zero Energy and Carbon in operation at occupation or, in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy</p>					<p>updated by the latest policy position to be published in the Autumn 2025.</p> <p>To align with recent evidence additional criteria should be added that on large sites energy use intensity can be represented as a site wide residential average to provide flexibility.</p> <p>Request that renewable energy must be generated on site by roof top solar PV energy on all development Typo</p>			<p>Requirement 3: Energy Use Intensity (EUI) limits</p> <p>The following non-residential buildings must achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:</p> <ul style="list-style-type: none"> • Offices – 70 kWh/m2 GIA/year; • Schools – 65 kWh/m2 GIA/year ; • Light Industrial – 35 kWh/m2 GIA/year; <p>On larger sites in exceptional circumstances this may be met on each individual phase as a</p>

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											<p>flexibility and the evidence that all the most prevalent typologies are deliverable to these standards now, non-compliant developments should not be given a five-year window to meet the policy. This degree of leniency is not expedient, considering the urgency of the climate crisis and local targets. It will ultimately delay the realisation of goals set by the Essex Climate Action Commission (ECAC), in its Net Zero: Making Essex Carbon Neutral Report (2021), that 'All new homes and all new commercial buildings granted planning permissions to be carbon zero by 2025' and 'All new homes and non-domestic buildings granted planning permission to be carbon positive by 2030.'</p> <p>3. Effective The updates to the EPOA Planning Policy Statement are being made for the following reasons. The technical evidence (Essex Net Zero Policy Study 2023) demonstrates that most residential typologies can achieve the standards set in the policy and generate sufficient renewable energy through rooftop solar PV on the basis of each individual home / building. This ensures that all residents have a home that meets the same standards and delivers the same benefits (e.g. healthy, energy efficient homes with low energy bills which are more resilient to a</p>	<p>use.</p> <p>ECC welcome the embedding of the Essex model policies for net zero in the Plan. These will require to be updated by the latest policy position to be published in the Autumn 2025.</p> <p>In the interim, ECC require the following amendments to Policy SD4, which reflect the upcoming changes to the Essex model net zero policy. Insert additional clause under Requirement 3b - New On larger sites in exceptional circumstances this may be met on each individual phase as a site-wide residential average (weighted by floor area) provided that no single dwelling has an EUI greater than 45 kWh/m2 GIA/yr.</p> <p>Amend Requirement 4,</p>								<p>site-wide residential average (weighted by floor area) provided that no single dwelling has an EUI greater than 45 kWh/m2 GIA/yr</p> <p>4. Requirement 4: Renewable energy must be generated on-site for all new developments by whichever of the following results in the greater amount of rooftop solar PV energy (electricity) generation: and</p> <p>a. The amount of energy generated in a year should match or</p>

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											<p>changing climate). The only exception where a residential typology will find it difficult to achieve all the policy requirements is the high-rise block of flats, as they would be unlikely to generate sufficient renewable energy to meet policy Requirement 4. In those cases, the energy offsetting mechanism may justifiably be triggered and used to achieve policy compliance. Bungalows have a slightly more relaxed standard for space heating in recognition of their less efficient form.</p> <p>In the Uttlesford Local Plan (June/July 2025) examination, an exceptional circumstances clause was included in their equivalent policy to Policy SD4 which allowed larger residential schemes to achieve the energy use intensity target on a site average basis. ECC commissioned further evidence to explore the implications of the exceptions clause (See pages 28-40 Appendix 4, ECC Hearing Statement to Matter 4, Issue 1, Climate for Uttlesford Local Plan Examination). The conclusion was that the clause enabled the flexibility that developers desired but it had significant negative impacts unless some modifications were made. The evidence report advised on options that would modify the clause that would still</p>	<p>Paragraph 1 of Policy SD4 to read:</p> <p>Renewable energy must be generated on-site for all new developments by rooftop solar PV energy (electricity) generation and the amount of energy generated in a year should match or exceed the predicted annual energy use of the building, i.e. Renewable energy generation (kWh/m2/year) = or > predicted annual energy use (kWh/m2/year)*</p> <p>In terms of calculation methods, the predicted annual energy use of a building / development would be expected to be calculated using predictive energy modelling, for residential buildings PHPP is often used, and for non-residential buildings often</p>													<p>exceed the predicted annual energy use of the building, i.e. Renewable energy generation (kWh/m2/year) = or > predicted annual energy use (kWh/m2/year); or</p> <p>b. The amount of energy generated in a year is:</p> <ul style="list-style-type: none"> at least 80 kWh/m2 building footprint per annum* for all building types; and at least 120 kWh/m2 building footprint per annum for industrial buildings. <p>B) Extensions and Conversions</p>

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											allow flexibility but guard against the worst impacts. Therefore, the Climate and Planning Unit at ECC advise that it would be pragmatic to include such a clause (with the recommended modifications) as it brings the 'flexibility' which is welcomed by Inspectors and Industry. Another amendment to Policy SD4 should clarify what 'maximised' means as part of Requirement 4. The renewable energy requirement clause is also proposed to be simplified so that it just relates to achieving energy balance on-site (including offsetting where this is justifiably triggered) and does not go beyond this (unless a developer wishes to). There is a typo in Part B) Extensions and Conversations'. Amend to read 'Conversions'	CIBSE TM54 methodology is used. The annual energy use of non-residential buildings can be predicted in a similar way to residential buildings by making assumptions based on the occupancy, typical use and size of building. Amend Part B) to read: Extensions and Conversations Conversions									
0343-0010	Agent	Ben	Weedall	Gladman Developments Ltd		SD4	Not Stated	This policy requires all new development to be fossil fuel free and demonstrate net zero operation carbon onsite, by	No	Not Stated						B	Policy SD4 Gladman do not consider that the Council's policy is necessary as there is already a national approach set out in Building Regulations and in the form of the Future Homes Standard and may also be covered through the National	As set out in reasoned justification paragraphs to Policy SD4, this has been informed by work at County level.	N		

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								achieving an energy use standard of 35kwh/m2/year for all new dwellings. These new dwellings are also identified as having a space heating demand of less than 15 kwh/mw/year. Gladman agree that there is a need to reduce carbon emissions in both the construction and use of residential development. However, Gladman do not									Development Management policies which are being drawn up. By utilising a national rather than local approach ensure uniformity across the whole country rather than a variety of different approaches which differ between local authority areas.		

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								consider that the Council's policy is necessary as there is already a national approach set out in Building Regulations and in the form of the Future Homes Standard and may also be covered through the National Development Management policies which are being drawn up. By utilising a national rather than local approach ensure											

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								uniformity across the whole country rather than a variety of different approaches which differ between local authority areas.											

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1000007	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SD4	No	See comments on SA and DtC	No	Justified, Consistent with national policy	The proposed policy position would require all new development to fossil fuel free and demonstrate net zero operational carbon onsite by ensuring energy use standard for all new dwellings of 35kwh/m2/year and space heating demand of less than 15 kwh/m2/year (20 kwh/m2/year for bungalows). This would be demonstrated through an Energy Assessment, which for major applications must be a full energy strategy utilising accurate methods for operational energy use prediction, such as Passivhaus Planning Package (PHPP) or CIBSE TM54. Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensures that improvements to building standards are actually		Yes	Not Answered	Yes	A	Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensures that improvements to building	Noted	N

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											<p>deliverable from the point at which they are introduced. However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the written ministerial statement (WMS) on local energy efficiency standards published on the 13th of December 2023. Before considering the content of the WMS itself it is important to note the High Court judgement from the 2nd of July 2024 ([2024] EWHC 1693 Admin). This judgement was on the challenge to the WMS made by Rights Community Action on three grounds, including that the WMS restricted exercise by local authorities of powers conferred on them. The judgment made by Justice Lieven was that the claim failed on all three grounds. This judgment was then appealed by Rights Community Action on the grounds that the judge erred in her interpretation of s19 of the Environment Act 2021 and s1 of the Planning and Energy Act 2008. Both these were dismissed with the decision notably stating with regard to the second ground of appeal that there was no support for the appellants argument that the WMS unlawfully cuts across the PEA 2008. The WMS</p>						standards are actually deliverable from the point at which they are introduced. Suggests inconsistency with written ministerial statement (WMS) on local energy efficiency standards published on the 13th of December 2023. HBF does not consider the approach set out in SD4 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. More detailed points provided. HBF would also recommend that that if a net zero policy is to be included in the local plan it should require a development to be net zero rather than for individual homes. As the council will be		

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											<p>is therefore compliant with the intention of Planning and Environment Act 2008 which, whilst allowing LPAs to set standards beyond building regulations, also enables government to establish the approach that should be taken in setting those standards. Local plan policies which seek to apply an alternative approach to setting standards not defined within building regulations, in this case Target Emissions Rates (TER), are therefore inconsistent with the WMS. HBF recognise that LPAs can depart from national policy where justified but as the Council will be aware the WMS must be treated as national policy and as such there is a high bar for departing from the approach it advocates. Moving to the WMS. It states that “Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes” and that local standards can “add further costs to building new homes by adding complexity and undermining economies of scale”. After noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that</p>							<p>aware, some homes, such as terrace houses and flats, are more intrinsically energy efficient and emit less carbon compared to detached homes and bungalows. As such it may be difficult for some individual homes to be net zero but where there is a mix of development the site as a whole to achieve the required standard.</p>		

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											<p>ensures:• That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. • The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).HBF does not consider the approach set out in SD4 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. Our detailed points are set out below.The approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric such as the one being proposed in the policy position paper and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target in order to avoid fragmentation of the standards with different requirements being set in</p>									

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											different areas which it must be recognised was not only an expectation of the WMS but also of the legislation that permits council to adopt higher standards in local plan in the first place. As such the HBF does not consider the council to be justified in departing from either the WMS or the Planning and Energy Act (2008) and considers the energy use requirements to be deleted from this policy. While HBF do not consider the policy to be consistent with national policy we are also concerned that the Council has not properly considered the impact on viability or the deliverability of development. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. In preparing its viability assessment HBF suggests the Council consider costs published by the Future Homes Hub (FHH) as part of their work to support and inform the implementation of the Future Homes Standard. The costs for similar standards to those being proposed can be found in the FHH report 'Ready for Zero'. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council. The various specifications and costs												

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											<p>considered are summarised in Figure 8 of 'Ready for Zero' and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around 15-19% higher than the 2021 Building Regs, around £17,000 to £22,000 more per unit. The council's Viability Assessment states at paragraph 5.79 that the costs of achieving its proposed policy to be 6.3% above current regulations for houses and 6.9% for flats. HBF recognise that the specifications are not direct comparison, but it does give an indication as to the potential cost and that the 6-7% increase in built cost proposed by the Council appears low. Given that there is still significant uncertainty as to the cost of delivering the standards being proposed and that much of the development being proposed by the Council will also face high costs site costs given that these are currently in employment and industrial uses the Council will need ensure that further sensitivity testing is undertaken in the viability study. There is clearly a risk that higher energy efficiency standard such as the ones being proposed could impact on viability and the delivery of allocated sites. With regard to deliverability of zero carbon homes HBF would not disagree that the proposed</p>												

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											standards are technically feasible. However, HBF are concerned as to the impact these requirements will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed are higher than those proposed in the Future Homes Standard and will require higher levels of fabric efficiency, which in turn will require new skills and materials that may not be readily available, HBF are concerned this could slow delivery in the short to medium term as supply chains are developed. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements to enable a steady build-up of skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would "... create a high risk of quality problems, inflated costs and, potentially, stalled build programmes." However, HBF can find no evidence that the Council has considered whether its proposed standard will impact on the rate at which new homes can be built. The Council will need to speak directly to a range of housebuilders operating in Castle Point to understand the impact of its policy on the rate at which homes will be									

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											<p>delivered on its allocated sites. Without any consideration of delivery then the Council's decision to go beyond what is required by building regulations is clearly unjustified While HBF understands the desire for LPAs to go further, current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 159b of the NPPF stating that "Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards".If the Council have the evidence to show that the policy is deliverable the Council will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for</p>										

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											example, not being designed in the character of the local area.HBF would also recommend that that if a net zero policy is to be included in the local plan it should require a development to be net zero rather than for individual homes. As the council will be aware, some homes, such as terrace houses and flats, are more intrinsically energy efficient and emit less carbon compared to detached homes and bungalows. As such it may be difficult for some individual homes to be net zero but where there is a mix of development the site as a whole to achieve the required standard.										
0353-0004	Organisation	Hyacinth	Cabiles	NHS Property		SD4		Draft Policy SD4 focuses on the ways in which new developments would need to be built to be net-zero carbon								A	Draft Policy SD4 focuses on the ways in which new developments would need to be built to be net-zero carbon from the outset. The NHS requires all new development projects to be net zero carbon, and NHSPS fully support policies	Support noted	N		

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								from the outset. The NHS requires all new development projects to be net zero carbon, and NHSPS fully support policies that promote carbon neutral development. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds collected where on-site carbon mitigation									that promote carbon neutral development. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.		

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								requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.											
098-0008	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 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		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 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	The council has written SD4 based on robust evidence	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											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'. 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.		
1440021	Organisation	Joseph	Beale	RSPB	Yes	SD4	Yes		Yes		There are several good parts to this Policy. It is suggested to use recycled materials as soil substrate with drought tolerant beds and planting. A mention of pollen and nectar rich plants and shrubs (pollinator planting) would be a welcome addition. The Beth Chatto housing estate model – dry gardens with planting of native (and potentially non-native) plants, could be referenced.	It is suggested to use recycled materials as soil substrate with drought tolerant beds and planting. A mention of pollen and nectar rich plants and shrubs (pollinator planting) would be a welcome addition. The Beth Chatto housing estate model – dry gardens with	No				There are several good parts to this Policy. It is suggested to use recycled materials as soil substrate with drought tolerant beds and planting. A mention of pollen and nectar rich plants and shrubs (pollinator planting) would be a welcome	Noted	N

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												planting of native (and potentially non-native) plants, could be referenced.					addition. The Beth Chatto housing estate model – dry gardens with planting of native (and potentially non-native) plants, could be referenced.		
10270010	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	SD4	Yes		No	Justified, Consistent with national policy	<p>Taylor Wimpey is in general support of progress towards the Future Homes standard and net zero ready housing. This is in the context of the NPPF (para 161) which is clear that ‘the planning system should support the transition to net zero to 2025.’ However, Policy SD4 is not sound on the basis that it goes beyond national standards and requirements in building regulations and there does not appear to be robust justification for this.</p> <p>As the Council will be well aware, the technology of net zero ready housing remains at an early stage, and is being worked through at both the national level, by the government, and through the planning and operational stages of emerging developments, by the housebuilding sector and Local Planning Authorities.</p> <p>New build homes in the UK are already built to high energy efficiency standards, and the forthcoming Future Homes Standard (FHS) will provide a consistent,</p>	see above - overall, Policy SD4 should be carefully reviewed and re-drafted so that the requirements are brought in line with building regulations and national requirements (consistent with national policy). The Policy must be robustly tested for practicability, deliverability and feasibility.	No	Not Answered		A	<p>Taylor Wimpey is in general support of progress towards the Future Homes standard and net zero ready housing. This is in the context of the NPPF (para 161) which is clear that ‘the planning system should support the transition to net zero to 2025.’ However, Policy SD4 is not sound on the basis that it goes beyond national standards and requirements in building regulations and there does not appear to be robust justification for this.</p> <p>Objects to this policy on the following basis:</p> <ul style="list-style-type: none"> • The energy 	Noted	N

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											<p>nationally regulated framework that supports scalable delivery of low-carbon housing. For volume developers, this consistency is critical, it enables streamlined design, procurement, and construction processes while avoiding the complexity and constraints associated with bespoke standards such as or equivalent to Passivhaus. FHS offers a pragmatic pathway to decarbonisation that balances performance with buildability, supply chain resilience, and placemaking flexibility. It is important that Local Authorities (LA) should not independently set standards that deviate from the requirements outlined in the building regulations. Building regulations are established at a national level to ensure consistency, safety and compliance across the country. LA's are responsible for enforcing these regulations and can provide guidance or supplementary requirements specific to local conditions, but these should align with national standards to ensure clarity, consistency and certainty.</p> <p>TW therefore objects to this policy on the following basis:</p> <ul style="list-style-type: none"> • The energy levels stated in 'Requirement 1' seem to align with Passivhaus standards which require (inter alia) an airtight building and are above the requirements of building 						<p>levels stated in 'Requirement 1' seem to align with Passivhaus standards which require (inter alia) an airtight building and are above the requirements of building regulations (which is a challenge in particular for volume housebuilders, as above).</p> <ul style="list-style-type: none"> • The energy use intensity limits in 'Requirement 3' are too onerous and are not aligned to national requirements (building regulations). Stringent EUI targets restrict flexibility in design. This can compromise placemaking, reduce density, and limit the ability to respond to local character or market preferences. • 'Requirement 4' seeks that renewable energy must be generated on- 		

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											<p>regulations (which is a challenge in particular for volume housebuilders, as above).</p> <ul style="list-style-type: none"> The energy use intensity limits in 'Requirement 3' are too onerous and are not aligned to national requirements (building regulations). Stringent EUI targets restrict flexibility in design. This can compromise placemaking, reduce density, and limit the ability to respond to local character or market preferences. 'Requirement 4' seeks that renewable energy must be generated on-site for all new developments – however, forthcoming building regulations will mandate PVs and the levels stated in the policy, are unlikely to fit on standard residential roofs. It is noted that the policy includes the flexibility where this requirement is not 'technically feasible' then there is the opportunity for offset payments. This general approach is supported; however, as above – such calculations can have a large impact on development viability. Further, TW would question the evidence base behind 'Requirement 5' which requires that 'In-use energy monitoring is required on a minimum of 10% of dwellings for development proposals of 100 dwellings or more, for the first 5 years of operation.' Further, it is not 											<p>site for all new developments – however, forthcoming building regulations will mandate PVs and the levels stated in the policy, are unlikely to fit on standard residential roofs. It is noted that the policy includes the flexibility where this requirement is not 'technically feasible' then there is the opportunity for offset payments. This general approach is supported; however, as above – such calculations can have a large impact on development viability.</p> <ul style="list-style-type: none"> Further, TW would question the evidence base behind 'Requirement 5' which requires that 'In-use energy monitoring is required on a minimum of 10% of 		

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											<p>clear what constitutes “as-built performance” - the policy needs to be clear what is being proposed to prevent inconsistent interpretation. Adding further as-built requirements risks duplication, increasing cost and administrative burden without clear added value. Further, with regard to part b - requiring in use energy monitoring on 10% of dwellings in large developments could raise challenges around both GDPR compliance and consumer acceptance.</p> <p>Overall, Policy SD4 should be carefully reviewed and re-drafted so that the requirements are brought in line with building regulations and national requirements (consistent with national policy). The Policy must be robustly tested for practicability, deliverability and feasibility.</p>						<p>dwellings for development proposals of 100 dwellings or more, for the first 5 years of operation.’ Further, it is not clear what constitutes “as-built performance” - the policy needs to be clear what is being proposed to prevent inconsistent interpretation. Adding further as-built requirements risks duplication, increasing cost and administrative burden without clear added value. Further, with regard to part b - requiring in use energy monitoring on 10% of dwellings in large developments could raise challenges around both GDPR compliance and consumer acceptance. Overall, Policy</p>		

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																	SD4 should be carefully reviewed and re-drafted so that the requirements are brought in line with building regulations and national requirements (consistent with national policy). The Policy must be robustly tested for practicability, deliverability and feasibility.		
0337-0003	Organisation	Alex	Savine	Thurrock Council		SD4	Yes	Thurrock Council welcomes the inclusion of Policy SD4 (Net Zero Carbon in Operation) requiring new development within the borough to be	Yes								TC supports the Net Zero Carbon Development policies SD4 In operation and SD5 Embodied Carbon as policies that represent a substantial step in addressing climate change across South Essex and providing certainty and clarity to developers.	CPBC and TC agree that it is appropriate to pursue a Climate Responsive Design approach in their respective local plans, while acknowledging that detailed policy in the Thurrock Local Plan will be subject to confirmation of evidence and testing.	N

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								ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match annual energy use.											
02820070	Organisation	Kevin	Fraser	Essex County Council	Yes	SD5	Not Stated		No	Justified, Effective	<p>ECC welcomes the inclusion of Policy SD5, which is based on Policy NZ2 in the EPOA Planning Policy Position for Net Zero Homes and Buildings in Greater Essex. Policy NZ2 was a 'placeholder policy for consultation purposes' until an Essex specific planning policy position for embodied carbon was prepared.</p> <p>The technical evidence to support an Essex specific embodied carbon policy was published in June 2024 (Essex Embodied Carbon Policy Study – available on the Essex Design Guide), and the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy, October 2025 has recently been made available (see Appendix 3) and is likely to be finalised by the Autumn 2025.</p> <p>The EPOA Planning Policy Statement Embodied Carbon</p>	<p>ECC require the policy title is amended to read:</p> <p>Policy SD5 – Embodied Carbon and Circular Economy</p> <p>ECC require the 'placeholder policy' Policy SD5 is replaced with the Policy GE2 set out in the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy, October 2025.</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	New evidence EPOA Planning Statement-Embodied Carbon and Circular Economy October 2025. Policy SP5 should be updated to "Embodied Carbon and Circular Economy" reflect this new evidence.	Accepted and policy title updated	Policy SD5 – Net Zero Carbon Development (Embodied Carbon and Circular Economy)

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											and Circular Economy is recommended to form the basis for SD5. This will ensure that SD5 is supported and justified by the technical evidence established for Greater Essex and also ensure SD5 is consistent with planning policies being developed across Greater Essex.								
0343-0011	Agent	Ben	Weedall	Gladman Developments Ltd		SD5	Not Stated	This policy requires proposals for large scale new-build developments, for residential schemes this is minimum of 100 dwellings, to submit a Whole Life-Cycle Carbon Assessment that demonstrates development meets the identified targets.	Not Stated							B	Policy SD5 As with policy SD4 this is a matter which best addressed at the national, rather than local level, to ensure that high standards are met across the entire country and avoid any confusion and repetition between local and national policies.	As set out in reasoned justification paragraphs to Policy SD5, this has been informed by work at County level.	N

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								As with the above policy this is a matter which best addressed at the national, rather than local level, to ensure that high standards are met across the entire country and avoid any confusion and repetition between local and national policies.											
1020008	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SD5	No		No	Justified	As with reducing carbon emissions from operational energy use HBF considers it best that such matters addressed at a national level to avoid different approaches and standard being set in different areas. The housebuilding industry is working with the Future Homes Hub it to develop a		Yes	Not Answered	Yes	A	As with reducing carbon emissions from operational energy use HBF considers it best that such matters addressed at a national level to avoid different	Noted	N

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											<p>roadmap to reducing embodied carbon and whilst Council's may want to go further faster HBF have concerns that this will impact on the deliverability of development with a disproportionate impact on SME developers. No evidence has been presented by the Council as to the potential for this to impact on the rate at which new homes are delivered and whether the proposed standard can be achieved on adoption of this local plan.</p> <p>Without evidence from the development industry that these standards can be met, the HBF considers the policy to be unjustified, and that it should be deleted from the local plan.</p>							<p>approaches and standard being set in different areas. The housebuilding industry is working with the Future Homes Hub it to develop a roadmap to reducing embodied carbon and whilst Council's may want to go further faster HBF have concerns that this will impact on the deliverability of development with a disproportionate impact on SME developers. No evidence has been presented by the Council as to the potential for this to impact on the rate at which new homes are delivered and whether the proposed standard can be achieved on adoption of this local plan.</p> <p>Without evidence from the development industry that these standards can be met, the</p>		

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																	HBF considers the policy to be unjustified, and that it should be deleted from the local plan.		
098-0009	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	SD5	No		No	Positively prepared, Effective, Justified, Consistent with national policy	<p>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 national route towards building sustainable and energy efficient homes.</p> <p>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.</p>		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. 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	Noted	N

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																	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.		
10360002	Not Answered	Allan	Edwards		Not Answered	SD5	Yes		Yes		SD5 - Net Zero Carbon Development (Embodied Carbon) is sound. However, given the plan seeks to maximise the delivery of homes by increased urbanisation and hence in some cases use smaller sites there is a missed opportunity to seek a reduction in embodied carbon across the borough by applying the policy to smaller sites.	Expanding the scope of the SD5 - Net Zero Carbon Development (Embodied Carbon) policy to residential sites of greater than 24 homes and an appropriately smaller area of commercial space, would deliver greater sustainability	No	Not Answered		A	Supports policy SD5 but identifies a missed opportunity in smaller sites so requests it be applicable to sites of 24 homes or more	Noted	N

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												across the borough.							
0337-0004	Organisation	Alex	Savine	Thurrock Council		SD5	Yes	Similarly, the inclusion of Policy SD5 (Embodied Carbon) follows, requiring Whole Life Cycle Carbon Assessments. These policies are considered to be a substantial positive step in addressing climate change which requires all authorities to act. Progressing with a similar policy stance across Greater	Yes								TC supports the Net Zero Carbon Development policies SD4 In operation and SD5 Embodied Carbon as policies that represent a substantial step in addressing climate change across South Essex and providing certainty and clarity to developers.	CPBC and TC agree that it is appropriate to pursue a Climate Responsive Design approach in their respective local plans, while acknowledging that detailed policy in the Thurrock Local Plan will be subject to confirmation of evidence and testing.	N

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								Essex will ensure a coordinated approach by Local Planning Authorities to this cross-boundary issue and provides clarity and certainty for the development industry on energy standards and planning application submission requirements.											

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1448-005	Organisation	David	Barton	Traditional Vernacular Architecture	Not Stated	SD5	Not Stated		Not Stated		<p>Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.</p> <p>2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal divides regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.</p> <p>3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.</p> <p>4. A brick by brick case study of as many buildings as possible may warrant invitation of national and</p>		Not Stated	Not Stated	Not Stated		<p>Calls for increasing carbon-rich old builds through support packages to combat climate change and improve conservation. Recommends retrofit ventilation in reconstructed old builds, prioritisation of embodied energy and carbon, brick-by-brick case studies inviting academic institutions, provision of sustainable materials directories or guides, and financial incentives to demolish carbon-poor towers to restore skylines.</p>	Noted	N

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											<p>international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.</p> <p>5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially</p> <p>Page 13 of 18</p> <p>again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.</p> <p>Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.</p>													

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1013-00112	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD6	Yes		Yes		<p>Anglian Water supports the policy to manage and reduce pollution, particularly through water efficient design and the installation of SuDS and delivery of multi-functional green infrastructure. We welcome clause 2 which includes reference to new development being affected by an adverse effect on the environment. We deduce from this statement, that this includes introducing an 'agent of change' to an area, something which is also alluded to in clause 3 regarding impacts on existing businesses and community facilities.</p> <p>NOTE: Anglian Water would suggest the supporting text could include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our essential infrastructure.</p>		No	Not Answered		A	<p>Anglian Water supports the policy to manage and reduce pollution, particularly through water efficient design and the installation of SuDS and delivery of multi-functional green infrastructure. We welcome clause 2 which includes reference to new development being affected by an adverse effect on the environment. We deduce from this statement, that this includes introducing an 'agent of change' to an area, something which is also alluded to in clause 3 regarding impacts on existing businesses and community facilities.</p> <p>NOTE: Anglian Water would suggest the supporting text could include</p>	<p>Modification: New paragraph</p> <p>21.56 Development proposals should be mindful of proximity to wastewater infrastructure facilities such as pumping stations and water recycling centres due to the presence of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of essential infrastructure.</p>	<p>Y-Modification: New paragraph</p> <p>21.56 Development proposals should be mindful of proximity to wastewater infrastructure facilities such as pumping stations and water recycling centres due to the presence of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of essential infrastructure.</p>

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																	specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our essential infrastructure.		
09220002	Organisation	Michael	Bevin gton	Electro sensitivity UK	Yes	SD6	Yes		No	Effective	Some people, including those with specific health conditions, are adversely affected by LED streetlights which have too much blue light. Street lighting should follow best practice for these health conditions. See information from LightAware on Streetlights and legal cases in the UK requiring local authorities to substitute safe lighting for harmful LEDs.	§21.56. Add: Best practice should be followed in providing LED lighting suitable for people sensitive to LEDs.	No	Not Answered		A	Some people, including those with specific health conditions, are adversely affected by LED streetlights which have too much blue light. Street lighting should follow best practice for these health conditions. See information from	Noted	N

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																	LightAware on Streetlights and legal cases in the UK requiring local authorities to substitute safe lighting for harmful LEDs.		
0823-0018	Organisation	Pat	Abbot	Environment Agency	Yes	SD6	Yes		Yes		We are pleased to see an overall policy on Pollution Control (SD6). While we support Policy SD6, the section on Industrial Development could go further to encourage remediation of previously developed land. This is a sustainable approach which provides an opportunity for environmental improvement via remediation. Point 2 – states development proposals should be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity. This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise, light, odour, heat, dust and vibration. Whilst we support this part of the policy, we feel it would be strengthened if “should” was replaced with “must”. SP4 ensures physical	We are pleased to see an overall policy on Pollution Control (SD6). While we support Policy SD6, the section on Industrial Development could go further to encourage remediation of previously developed land. This is a sustainable approach which provides an opportunity for environmental improvement via remediation. Point 2 – states development proposals should be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity. This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise,	No	Not Answered		A	Supports policy SD6 but requests some modifications: Point 2 – states development proposals should be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity. This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise,	Support noted, see proposed modifications	2. Development proposals should must be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity. This may include by reason of

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											<p>infrastructure will support environmental objectives which will include the WFD requirement for no deterioration, therefore new developments will mitigate pollution to water under SP4. Point 4 – We support the inclusion of this part of the policy which states ‘major development applications require a CEMP including prevention of pollution to watercourses.’ Paragraphs 21.52 and 21.53 - In the reasoned justification for policy SD6, we would like to see a merging of points 21.52 and 21.53 to prevent misunderstanding of the information. The AMP programme and SUDs provide improvements to water quality, but they are not limited to improvements under the Habitats Regulations. Paragraph 21.54 - We support the inclusion in the reasoned justification that infiltration SuDS are not appropriate on all locations, and the reference to CIRIA C753 SuDS Manual in design (21.54, 21.57). We further recommend that the following guidance is referenced within this policy: National standards for sustainable drainage systems on gov.uk, particularly Standard 4 water quality; The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13.</p>	<p>health of new and existing residents or surrounding residential amenity. This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise, light, odour, heat, dust and vibration. Whilst we support this part of the policy, we feel it would be strengthened if “should” was replaced with “must”. SP4 ensures physical infrastructure will support environmental objectives which will include the WFD requirement for no deterioration, therefore new developments will mitigate pollution to water under SP4. Point 4 – We support the inclusion of this part of the policy which states</p>				<p>light, odour, heat, dust and vibration. Whilst we support this part of the policy, we feel it would be strengthened if “should” was replaced with “must”. SP4 ensures physical infrastructure will support environmental objectives which will include the WFD requirement for no deterioration, therefore new developments will mitigate pollution to water under SP4. Point 4 – We support the inclusion of this part of the policy which states ‘major development applications require a CEMP including prevention of pollution to watercourses.’ Paragraphs 21.52 and 21.53 - In the reasoned justification for policy SD6, we would like to see a merging of</p>			<p>pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise, light, odour, heat, dust and vibrations.</p> <p>21.52 The Environment Agency's Thames River Basin Management Plan identifies that the lower Thames Estuary is of a moderate quality in terms of its ecological status and is failing to achieve a good chemical status. The Water Environment (Water Framework Directive) Regulation</p>

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											<p>Paragraph 21.54 - reads, 'Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be installed, should site conditions allow.' For clarity we would recommend stronger wording of this sentence. This is suggested as, 'Infiltration SuDS must not be constructed in contaminated ground as they have the potential to provide a pathway for pollutants. However, there is the option for lined SuDS features to be installed, should site conditions allow.'</p> <p>Paragraph 21.57 – The current wording in this paragraph reads 'implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface water do not result in the contamination of land or local water courses nearby, or further afield, or result in adverse impacts to human health and residential amenity' We recommend a revision of the wording to include 'ensure any pollutants carried in surface water do not result in contamination of land or local water courses' to include ground water (21.57).</p>	<p>'major development applications require a CEMP including prevention of pollution to watercourses.'</p> <p>Paragraphs 21.52 and 21.53 - In the reasoned justification for policy SD6, we would like to see a merging of points 21.52 and 21.53 to prevent misunderstanding of the information. The AMP programme and SUDs provide improvements to water quality, but they are not limited to improvements under the Habitats Regulations.</p> <p>Paragraph 21.54 - We support the inclusion in the reasoned justification that infiltration SuDS are not appropriate on all locations, and the reference to CIRIA C753 SuDS Manual in design (21.54, 21.57). We further recommend that the following guidance is</p>					<p>points 21.52 and 21.53 to prevent misunderstanding of the information. The AMP programme and SUDs provide improvements to water quality, but they are not limited to improvements under the Habitats Regulations.</p> <p>Paragraph 21.54 - We support the inclusion in the reasoned justification that infiltration SuDS are not appropriate on all locations, and the reference to CIRIA C753 SuDS Manual in design (21.54, 21.57). We further recommend that the following guidance is referenced within this policy: National standards for sustainable drainage systems on gov.uk, particularly Standard 4 water quality; The Environment</p>		<p>s 2017 aims to secure no further deterioration of waterbodies and to ensure that the status of waterbodies is improved. Whilst the Thames Estuary is the main waterbody in Castle Point to which this applies, it also applies to all other main rivers in the Borough. 21.53 The Habitats Regulations Assessment identifies that new development is likely to impact on water quality...</p> <p>21.54 ECC as the LLFA will not support developme</p>

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												referenced within this policy: National standards for sustainable drainage systems on gov.uk, particularly Standard 4 water quality; The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13. Paragraph 21.54 - reads, 'Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be installed, should site conditions allow.' For clarity we would recommend stronger wording of this sentence. This is suggested as, 'Infiltration SuDS must not be constructed in contaminated ground as they have the potential to provide a					Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13. Paragraph 21.54 - reads, 'Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be installed, should site conditions allow.' For clarity we would recommend stronger wording of this sentence. This is suggested as, 'Infiltration SuDS must not be constructed in contaminated ground as they have the potential to provide a pathway for pollutants. However, there is the option for lined SuDS features to be installed, should site conditions		nts that propose to connect surface water to foul sewers as these systems can become overwhelmed, increasing the risk of flooding and pollution occurring. SuDS features should be designed in line with the updated Construction Industry Research and Information Association (CIRIA) SuDS Manual (CIRIA C753) and National standards for sustainable drainage systems, particularly Standard 4 water quality and The

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												<p>pathway for pollutants. However, there is the option for lined SuDS features to be installed, should site conditions allow.'</p> <p>Paragraph 21.57 – The current wording in this paragraph reads 'implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface water do not result in the contamination of land or local water courses nearby, or further afield, or result in adverse impacts to human health and residential amenity' We recommend a revision of the wording to include 'ensure any pollutants carried in surface water do not result in contamination of land or local water courses' to include ground water (21.57).</p>					<p>allow.'</p> <p>Paragraph 21.57 – The current wording in this paragraph reads 'implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface water do not result in the contamination of land or local water courses nearby, or further afield, or result in adverse impacts to human health and residential amenity' We recommend a revision of the wording to include 'ensure any pollutants carried in surface water do not result in contamination of land or local water courses' to include ground water (21.57).</p>		<p>Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13. Water quality Management guidance can be found within Chapter 26 of the manual. When choosing potential SuDS features, consideration around ground conditions and contamination is paramount. Infiltration SuDS must not be constructed in contaminated ground as they have the potential</p>

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																			<p>to provide a pathway for pollutants. Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be installed, should site conditions allow. Evidence of pollution mitigation supplied must be demonstrated.</p> <p>21.57 Industrial development may give rise to pollution to land and water, and/or result in disturbance to habitat sites. Due to the limited scale of</p>

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																			industrial development, proposed studies have not focused on the impacts of this type of development in the Borough. These will be dealt with on a case-by-case basis in order to ensure that activities do not have an adverse impact on the environment or residential amenity. In particular, the implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface

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																				water do not result in the contamination of land, ground water or local water courses nearby, or further afield, or result in adverse impacts to human health and residential amenity.
1012-00112	Agent	Arun	Sriskanda	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	Support noted	N	

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																	that they will not prejudice the continuing operations of those existing businesses.		
0323-00111	Organisation	Michael	Atkins	Port of London Authority		SD6											Policy SD6 – Pollution Control: Support part 3 of the policy which states 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, 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	Policy SD6: Support and points noted	N

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																	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 specific reference should be given to the 'Agent of Change' principle that part 3 of the policy sets out.		
1440004	Organisation	Joseph	Beale	RSPB	Yes	SD6	Yes		Yes		Given the important invertebrate populations in Castle Point, further reference to the impact of artificial light on invertebrate populations would be welcome here.	Modifications:: Section 21.56 addition - given the important invertebrate populations in Castle Point, further reference to the impact of artificial light on invertebrate populations would be welcome here.	No				Requested Modifications: Section 21.56 addition - given the important invertebrate populations in Castle Point, further reference to the impact of artificial light on invertebrate populations would be welcome here.	21.56 already highlights the impacts of light pollution on 'nature conservation'. This would include invertebrates but also other species that are negatively affected, such as bats.	N

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0823-0019	Organisation	Pat	Abbot	Environment Agency	Yes	SD7	Yes		Yes		We are pleased to see an overall policy SD7 for dealing with land affected by contamination. We welcome the specific acknowledgement of ground water as a receptor. The requirement to manage contamination during development is clearly referenced in the desktop study and potential intrusive site investigation, but we suggest reference is added to published guidance: 'Developers should follow the risk management framework provided in 'Land Contamination: Risk Management', when dealing with land affected by contamination.'	We are pleased to see an overall policy SD7 for dealing with land affected by contamination. We welcome the specific acknowledgement of ground water as a receptor. The requirement to manage contamination during development is clearly referenced in the desktop study and potential intrusive site investigation, but we suggest reference is added to published guidance: 'Developers should follow the risk management framework provided in 'Land Contamination: Risk Management', when dealing with land affected by contamination.'	Not Answered	Not Answered		A	Supports policy SD7 but suggests the following amendments: but we suggest reference is added to published guidance: 'Developers should follow the risk management framework provided in 'Land Contamination: Risk Management', when dealing with land affected by contamination.'	Support noted, see proposed modifications	21.62 Contaminated land could be created as a result of uses such as petrol stations, car washes, sites used for industrial and commercial storage, and agriculture due to pollutants produced by the previous or existing site uses. It is important to ensure pollutants do not harm the health of the public or environment and that future development does not exacerbate these issues. Developers should follow the risk

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												21.57 that 'The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.'								management framework provided in 'Land Contamination: Risk Management', when dealing with land affected by contamination. The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.
14400017	Organisation	Joseph	Beale	RSPB	Yes	SD7	Yes		No	Justified	Contaminated land can be biodiverse brownfield habitat, and can have good floral diversity and invertebrate interest. In addition to broader environmental or pollution hazards, this fact should be acknowledged in this Policy. The Essex LNRS mentions repeatedly the potential for brownfield sites to be biodiverse and hold scarce species. For example, 6.6, Urban p.136: brownfield sites — 'disused developed land' can serve as both a valuable wild space for nearby communities and a refuge for a variety of priority	Add a new sentence to clarify that contaminated sites can be biodiverse brownfield habitat. For example: "Where a site is contaminated the Council will not permit development if it of biodiversity value."	No				Contaminated land can be biodiverse brownfield habitat, and can have good floral diversity and invertebrate interest. In addition to broader environmental or pollution hazards, this fact should be acknowledged in this Policy. The Essex LNRS mentions repeatedly the	Noted	N	

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											<p>invertebrates.</p> <p>Also 14. Understand existing local habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an important first step to creating new spaces for wildlife and protecting the wider environment. Monitor biodiversity on brownfield sites as they can often become important habitats for invertebrates and early successional communities.'</p> <p>Also, Priority Species – Shril Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.'</p> <p>Also: 8.2 Grassland and Meadows, p.202: 'Flower-rich grassland is often an important component of open mosaic habitats, such as those found on aggregates sites and previously developed land (brownfield).'</p>											<p>potential for brownfield sites to be biodiverse and hold scarce species. For example, 6.6, Urban p.136: brownfield sites — 'disused developed land' can serve as both a valuable wild space for nearby communities and a refuge for a variety of priority invertebrates.</p> <p>Also 14. Understand existing local habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an important first step to creating new spaces for wildlife and protecting the wider environment. Monitor biodiversity on brownfield sites as they can often become important habitats for invertebrates and early</p>		

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																	<p>successional communities.'</p> <p>Also, Priority Species – Shril Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.'</p> <p>Also: 8.2 Grassland and Meadows, p.202: 'Flower-rich grassland is often an important component of open mosaic habitats, such as those found on aggregates sites and previously developed land (brownfield).'</p> <p>Add a new sentence to clarify that contaminated sites can be biodiverse brownfield habitat. For example:</p> <p>"Where a site is contaminated the Council will not permit development if it of biodiversity value."</p>		

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1013-0013	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD9	Yes		Yes		<p>Anglian Water strongly supports the policy requirements. In addition to the publications referenced in the supporting text, the tighter water efficiency standard of 90 litres per person per day (l/p/d) aligns with the Shared Standards for Water Efficiency in Local Plans, which was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery.</p> <p>https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf</p> <p>The Shared Standards recommend that LPAs include Local Plan Policies that:</p> <p>Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d).</p>		No	Not Answered		A	Anglian Water strongly supports the policy requirements. In addition to the publications referenced in the supporting text, the tighter water efficiency standard of 90 litres per person per day (l/p/d) aligns with the Shared Standards for Water Efficiency in Local Plans, which was published in June 2025. Reference to shared standards and BREEM.	Modifications agreed as set out in Schedule of Modifications and the Statements of Common Ground of the Water Companies and Essex CC.	Y - Modifications agreed as set out in Schedule of Modifications and the Statements of Common Ground of the Water Companies and Essex CC.

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											<p>Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (suggests a range between 85-95 l/p/d subject to viability and feasibility).</p> <p>Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator.</p> <p>Require new major non-domestic developments to include water saving measures and water reuse in their design.</p> <p>These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.</p>									

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											<p>Whilst Anglian Water is not the statutory water undertaker for Castle Point, tighter water efficiency standards mean lower flows of wastewater that consequently result in less operational carbon being expended in pumping flows through our networks and treatment at our WRCs. As a partner to the Shared Standards, we endorse the requirement for 90 l/p/d for new residential development and for all new non-household (commercial development) to meet the full credits in BREEAM's WAT 01 calculator.</p> <p>In terms of wastewater and policy clause 4 - we endorse this policy approach for wastewater infrastructure which aligns with similar policies in other Local Plans across our region. Anglian Water advises developers to seek early engagement on their proposals for wastewater connections. For example, we may require a sustainable point of connection to our network, particularly where a site may trigger a number of risks - such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding.</p> <p>We welcome the supporting text set out in paragraphs 21.72 - 21.76 which clearly define our role and investment in sewerage infrastructure.</p>										

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0820020	Organisation	Pat	Abbot	Environment Agency	Yes	SD9	Yes		Yes		We acknowledge that the recent Future Homes Hub Water Efficiency report (Water Ready) (April 2024) (Future Homes Hub Water Efficiency Report), has been used to demonstrate the water efficiency reasoning within the draft Local Plan. Point 1 of the policy will require all new residential development to achieve a water efficiency standard of 90 litres person per day. Where it can be demonstrated this is not feasible part 2g and regulations 36(2) (b) of the building regulations will apply. We would recommend a clear definition of 'non feasibility' is include in the reasoned justification. A description of evidence required to show the non-feasibility should be included. Consideration needs to be given to how water use will be monitored against the 90 l/p/d target. We recommend you require a Water Efficient Design Statement to be submitted with the development application at the early stage Paragraph 21.70 – Provides the reasoned justification for a residential water efficiency target of 90 litres per person per day (l/p/d) in Castle Point, above the national baseline of 125 l/p/d and the optional higher standard of 110 l/p/d. The Water Ready report and the Shared Standards in Water Efficiency for	We acknowledge that the recent Future Homes Hub Water Efficiency report (Water Ready) (April 2024) (Future Homes Hub Water Efficiency Report), has been used to demonstrate the water efficiency reasoning within the draft Local Plan. Point 1 of the policy will require all new residential development to achieve a water efficiency standard of 90 litres person per day. Where it can be demonstrated this is not feasible part 2g and regulations 36(2) (b) of the building regulations will apply. We would recommend a clear definition of 'non feasibility' is include in the reasoned justification. A description of evidence required to show the non-feasibility should	Not Answered	Not Answered		A	Requests adoption of shared water standards and ammendments to the policy to reflect these	The shared water standards has been adopted and ammendments have been made to the policy as required (please see mods list).	N

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											Local Plans both show that this level is technically achievable through a fittings based approach, reduced demand, and, where appropriate, water reuse systems. We support this aspiration given the stresses on water supply in the area. Section 21.743 - States 'growth locations are known through this plan, Anglian Water can plan for that growth through their five-year Asset Management Plan'. It should be noted that the current AMP period, AMP8, runs from 2025-2030 and may not be able to incorporate new infrastructure improvements. It is important that where sufficient capacity is not available, construction or occupation phasing occurs, in line with policy SP4. Point 4 - States 'All new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development'. We feel that "must" should be used in place of "should" in the first line. This will strengthen the policy and ensure that developers meet their requirements under the WFD legislations, ensuring no deterioration of	be included. Consideration needs to be given to how water use will be monitored against the 90 l/p/d target. We recommend you require a Water Efficient Design Statement to be submitted with the development application at the early stage Paragraph 21.70 - Provides the reasoned justification for a residential water efficiency target of 90 litres per person per day (l/p/d) in Castle Point, above the national baseline of 125 l/p/d and the optional higher standard of 110 l/p/d. The Water Ready report and the Shared Standards in Water Efficiency for Local Plans both show that this level is technically achievable through a fittings based approach, reduced demand, and, where appropriate, water reuse systems. We										

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											<p>watercourses through development.</p> <p>We support the wording that development applications 'Must include confirmation of ... capacity at the WRC that will serve the development'. And that confirmation of this must come from Anglian Water, the foul water undertaker.</p>	<p>support this aspiration given the stresses on water supply in the area.</p> <p>Section 21.743 - States 'growth locations are known through this plan, Anglian Water can plan for that growth through their five-year Asset Management Plan'. It should be noted that the current AMP period, AMP8, runs from 2025-2030 and may not be able to incorporate new infrastructure improvements. It is important that where sufficient capacity is not available, construction or occupation phasing occurs, in line with policy SP4.</p> <p>Point 4 – States 'All new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve</p>										

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												<p>the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development'. We feel that "must" should be used in place of "should" in the first line. This will strengthen the policy and ensure that developers meet their requirements under the WFD legislations, ensuring no deterioration of watercourses through development. We support the wording that development applications 'Must include confirmation of ... capacity at the WRC that will serve the development'. And that confirmation of this must come from Anglian Water, the foul water undertaker.</p>									

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0339-0003	Organisation	Sarah	Bowerman	Essex and Suffolk Water		SD9	Yes	We welcome Policy SD9 Water Supply and Waste Water. While we acknowledge that this policy states that all new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day (PCC), we wish to formally draw your attention to the recently published regional shared standard	Yes		At present it is feasible to achieve a total consumption of 85 litres/person/day by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. These standards aim to drive meaningful progress in water efficiency. Achieving this enhanced level of performance not only contributes to environmental sustainability but also strengthens the resilience of future developments in the face of growing pressures on water resources, driven by climate change and population growth. Whilst we recognize that an 85 litres/person/day PCC target, explained in the shared standards, may be challenging, we expect it to be very achievable within the timeframe of this plan and so we will be encouraging this target through our financial reward scheme of environmental incentives for developers. These are tied into Company Business Plans that are published every five years with the latest being published in 2025. Policy SD9 will support sustainable growth in Castle Point by promoting greater water efficiency in new developments, while longer-term water supply solutions are planned and delivered. Water efficient new					A	Welcome Policy SD9 Water Supply and Waste Water. Refers to the Shared Standards for Water Efficiency in Local Plans was published in June 2025.	Mod agreed with Essex CC as set out in the Scghedule of Mods and Statements of Common Ground with ECC and Essex and Suffolk Water	Y

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								s for water efficiency in local plans, Shared Standards in Water Efficiency for Local Plans. The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water,			development means demands will be less than otherwise would be the case, which in turn means the quantity of water we need to abstract from the environment is also less. This supports national objectives for sustainable abstraction as set out in the National Framework for Water Resources 2025.								

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								the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support											

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								a clean and sustainable supply of water - essential for growth and nature recovery . The Shared Standards recommend that LPAs include Local Plan Policies that: <ul style="list-style-type: none"> Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person 											

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								per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible. <ul style="list-style-type: none"> Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. Require new major non-domestic develop 												

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								ments to include water saving measures and water reuse in their design. These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage											

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								a range of challenges across the water environment and aid nature recovery . Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity											

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								is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.											

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02820074	Organisation	Kevin	Fraser	Essex County Council	Yes	SD9	Not Stated		No	Justified, Effective	Essex is a seriously water stressed area and it is important to maximise water efficiency in all new residential and non-residential development consistent with standards evidenced through a Water Cycle Study and the water industry. The Shared Standards in Water Efficiency for Local Plans (June 2025) is part of a joint initiative by Natural England, the Environment Agency, and water companies (Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water) endorsed by Water Resources East to support Local Planning Authorities (LPAs) to deliver sustainable growth. The Shared Standards provide advice and evidence to LPAs on how they can secure higher water efficiency standards for new homes and commercial developments. Suggested model policy wording is provided under the heading 'Draft policy: Water Resources and Sustainable Growth' (page 7). It is sought that these recommended policies be reviewed for potential inclusion in Policy SD9 to ensure it is more robust. 2. Justified CPBC should prepare an up-to-date Water Cycle Study to help evidence a potential water efficiency standard of 85 l/p/d of mains supplied water/potable water per	ECC seek that the model policies in the Shared Standards in Water Efficiency for Local Plans be reviewed and incorporated in Policy SD9, as appropriate. ECC recommend CPBC prepares an up-to-date Water Cycle Study to compile local evidence that demonstrates that water scarcity is having or is likely in the future to have an adverse impact on the environment and how water efficiency can protect the environment and support nature recovery, whilst not adversely affecting viability of development. CPBC should prepare an up-to-date Water Cycle Study to help evidence a potential water efficiency standard of 85 l/p/d of mains supplied water/potable water per person per day. The	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Essex is a water stressed area, recommends a water cycle study. Recommends that the model policies in the Shared Standards in Water Efficiency for Local Plans be reviewed and incorporated in Policy SD9, as appropriate. Recommends a water cycle study to establish water efficiency standards to be consistent with the shared standards in water efficiency developed by the water authorities, Environment Agency and Natural England and endorsed by Water Resources East to address any water resources issues in Essex. Recommends the preparation of a water cycle study to evidence a potential water efficiency standard of 85lppd as	CPBC has integrated the Shared Standard in Water Efficiency into SD9. These standards are supported by the research by Water Resources East, which also covers South Essex Water Resources East as an organisation covered the East of England including Essex and did extensive research into water resources in the region and their evidence base supports the efficiency standard of 85lppd to be applied across the region. CPBC has adopted the higher water efficiency standard of 85lppd within its policies as recommended by the Shared Standards in Water Efficiency endorsed by Natural England, Environment Agency and Water Resources East. Amended text but included the higher efficiency standard. CPBC has commissioned some additional work on Waste Water Treatment	1. All new residential development will be required to achieve a water efficiency standard of 85 90 litres per person per day of mains supplied water/potable water Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply. 2. All non-residential development should achieve full credits for Wat01 of BREEAM. New, extended or redeveloped non-household ('non-household' means all developme

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											<p>person per day. The water efficiency standard of 90 l/p/d, is welcomed, but is higher than the recommended East of England 85 l/p/d Shared Standards in Water Efficiency for Local Plans. ECC seek no change to the 90 l/p/d target set in Policy SD9, as it is within the range suggested by the Shared Standards (p. 17), subject to any evidence provided through a water cycle study. However, the second sentence should be deleted as it weakens the policy intent to strengthen water efficiency. CPBC should prepare an up-to-date Water Cycle Study to compile local evidence that demonstrates that water scarcity is having or is likely in the future to have an adverse impact on the environment and how water efficiency can protect the environment and support nature recovery, whilst not adversely affecting viability of development. The Shared Standards for non-residential buildings are more stringent than those in Policy SD9. They provide evidence for the necessity of such requirements, as well as their feasibility and viability. As it is a more ambitious approach, it is required that the Shared Standards recommendations for non-residential buildings be adopted in Policy SD9 in place of criteria 2 - All non-residential development</p>	<p>water efficiency standard of 90 l/p/d, is welcomed, but is higher than the recommended East of England 85 l/p/d Shared Standards in Water Efficiency for Local Plans.</p> <p>ECC require Criteria 1 is amended to read:</p> <p>All new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day of mains supplied water / potable water per person per day . Where it can be demonstrated that this is not feasible part G2 and regulation 36(2)(b) of the Buildings Regulations will apply. ECC require the Shared Standards in Water Efficiency for Local Plans requirements for non-residential buildings be adopted in Policy SD9, Criteria 2:</p>					<p>recommended by the Shared Standards. Recommends removal of the option to provide current building regulation water efficiency standards Recommended that the Shared Standards recommendations for water efficiency is applied to non-residential buildings. All development proposals to provide a Water Efficient Design Statement which should provide baseline information pre-development and full calculations of expected water use for the proposed development. Welcomes reference to Future Homes Hub Water Efficiency Report. The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans</p>	<p>Work Capacity within the Borough which will be implemented into the submitted plan. CPBC has adopted the higher water efficiency standard of 85lppd within its policies as recommended by the Shared Standards in Water Efficiency and is endorsed by Natural England, Environment Agency and South Essex water authorities. Water Resources East prepared evidence on water resources for the East of England including Essex and supports a water efficiency standard of 85llpd. Amended text but included the higher efficiency standard of 85llpd and removed the text which referenced part G2 and regulation 36(2)(b) of the Buildings Regulations will apply. CPBC has commissioned some additional work on Waste Water Treatment Work Capacity within the Borough which will be</p>	<p>nt except residential dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</p>

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											<p>should achieve full credits for Wat 01 of BREEAM</p> <p>The Shared Standards also provide recommendations on how to demonstrate compliance, such as through the submission of a Water Efficient Design Statement. ECC recommend that similar clauses be included in Policy SD9 to provide more clarity to both policy officers and developers on the information that must be submitted to confirm that the policy has been met. ECC welcome reference to the Future Homes Hub Water Efficiency Report.</p> <p>The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans setting out its key recommendations.</p> <p>The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans setting out its key recommendations.</p>	<p>New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREEAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREEAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</p> <p>ECC seek an additional Criteria be added to read:</p> <p>A Water Efficient Design Statement must be submitted with the application at the earliest stage</p>					<p>setting out its key recommendations.</p> <p>Typo in final sentence should be amended</p> <p>ECC requests a long justification paragraph explaining the Shared Standards in Water Efficiency and the application of 85lppd.</p> <p>Accepted typo corrected</p> <p>Accepted.</p> <p>Additional justification to support the policy should be provided.</p>	<p>implemented into the submitted plan.</p> <p>Accepted and text amended to include all non-residential development to achieve full credits for Wat 01 of BREEAM.</p> <p>CPBC accepts the requirement of a Water Efficient Design Statement to demonstrate how water efficiency is met in development.</p>	<p>5. A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:</p> <p>a) Baseline information relating to existing water use within a development site; and</p> <p>b) Full calculations relating to expected water use within a proposed</p>

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												<p>to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:</p> <p>a) Baseline information relating to existing water use within a development site; and</p> <p>b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling). ECC recommend the typo in the final sentence is amended to read:</p> <p>The fittings approach is where water fittings and appliances are selected which</p>									development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling). The fittings approach is where water fittings and appliances are selected which have a capacity up to the maximum flow rate only. The Shared Standards in Water Efficiency for Local Plans (June 2025) set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water,

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												(l/p/d). Where there is insufficient justification for 85 l/p/d, for example on viability grounds or local environmental risks, a design standard that is more stringent than building regulations should be implemented such as 90 or 95 l/p/d. <ul style="list-style-type: none"> • The tightest standards of water efficiency in new, extended or redeveloped non-household development should aim to achieve full credits in the BREEAM water calculator, with a minimum of 3 credits in WAT013. • All major non-household developments should include water saving measures and water reuse in their designs. • An up-to-date Water Cycle Study (WCS) should be conducted to compile local 												

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												evidence that demonstrates that water scarcity is having or is likely in the future to have an adverse impact on the environment and how water efficiency can protect the environment and support nature recovery, whilst not adversely affecting viability of development. • The LPA monitoring reports should be used to monitor the water efficiency policies to demonstrate the policies are being correctly followed and are effective.								
0343-0012	Agent	Ben	Weedall	Gladman Developments Ltd		SD9		The policy requires all new residential development to achieve a water efficiency standard of 90 litres per person								B	Policy SD9 Object to lower water efficiency standards. State that the The water standard is best calculated at a national level in accordance with building regulations,	Noted. Policy SD9 supported by evidence, noting that Essex is a water stressed area.	N	

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								per day. New development should incorporate rainwater harvesting and grey water technologies for non-potable water uses on site. Finally, new development should demonstrate that adequate foul water treatment and drainage already exist or can be provided in time to serve the development. 4.1.7 The requirement for 90 litres											

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								per person is not in line with national policy which requires residential development to achieve 110 l/p/d, additionally this requirement is for water stressed areas. The water standard is best calculated at a national level in accordance with building regulations, currently the future water standards are being considered which will phase the											

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								introduction of consistent standards across the country. 4.1.8 With regards to foul water, it is not the responsibility of the housebuilder to ensure that the water company can service a development by providing connections. Water companies have a legal responsibility to ensure that the requirements of the development plan system											

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								can be met by virtue of the Water Industry Act 1991. 4.1.9 The Water Companies are required by law to publish a Water Resource Management Plan every five years which is approved by the Environment Agency and Defra, as part of this the water company will need to account for future development requirements of the local											

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								authority . Therefore this policy should be removed from the plan as it is dealt with by other provisions under other legislation as above.											

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1020009	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SD9	No		No	Justified, Consistent with national policy	<p>Firstly, the lower water standard of 90 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas. Future water standards are being considered that will phase the introduction of lower standards and the council should not look to introduce lower standards ahead of these recognising that a consistent national approach is the best way of ensuring improved standards whilst maintaining the delivery of new homes. The only reason for a lower standard would be where the issue of water supply is inhibiting the potential adoption of the local plan and the delivery of new homes.</p> <p>Secondly, the policy states in part 4 that "All new development should demonstrate that adequate foul water treatment and drainage already exist or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development".</p> <p>It is not the responsibility of the housebuilder to ascertain whether the water company can service a development by providing the connections required. It is the legal responsibility of the water company to ensure that the requirements of the</p>		Yes	Not Answered	Yes	A	<p>The lower water standard of 90 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas. Future water standards are being considered that will phase the introduction of lower standards and the council should not look to introduce lower standards ahead of these recognising that a consistent national approach is the best way of ensuring improved standards whilst maintaining the delivery of new homes. The only reason for a lower standard would be where the issue of water supply is inhibiting the potential adoption of the local plan and the delivery of new homes.</p> <p>Secondly, the policy states in part 4 that "All</p>	Noted	N

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											<p>development plan system can be met. To this end, they are required to publish, by law, every five years a Water Resources Management Plan (WRMP) to ensure just this. This is set out in sections 37A to 37D of the Water Industry Act 1991. This plan is approved by the Environment Agency, and ultimately by Defra. The WRMP cannot be approved unless the water company can provide the assurance that the needs of the development plan system can be supported. To ensure this, the water company must take into account the future development requirements of the local authority.</p> <p>The Government provides more detailed advice about what the WRMP must address in Section 6.3 of the Water Resources Planning Guidance. The Government's guidance can be read here: https://www.gov.uk/government/publications/water-resources-planning-guideline/water-resources-planning-guideline. The Government guidance states in Section 1.1 that these plans must forecast water supply and demand over at least the statutory minimum period of 25 years (see Section 1.1). If companies forecast a deficit, they should consider either supply-side options to increase the amount of water available to the water company or demand-side options which reduce the</p>											new development should demonstrate that adequate foul water treatment and drainage already exist or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development". It is not the responsibility of the housebuilder to ascertain whether the water company can service a development by providing the connections required. It is the legal responsibility of the water company to ensure that the requirements of the development plan system can be met. To this end, they are required to publish, by law,		

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											<p>amount of water customers require.</p> <p>Section I of the guidance states with regard to local plans “Local authority plans set out future development, such as housing. Your WRMP should reflect local growth ambitions and plan to meet the additional needs of new businesses and households. (See sub-section 6.3)” with sub-section 6.3 stating: “Your planned property and population forecasts, and resulting supply, must not constrain planned growth. For companies supplying customers in England, you should base your fore-cast population and property figures on local plans published by the local council or unitary authority.”</p> <p>Issues with the inability of water companies to provide connections for new residential development is not a matter for housebuilders to resolve. They cannot. If this is an issue in Castle Point, then it is one that goes to the heart of the deliverability of the local plan. Allocations may be undeliverable. If there is an issue, then the issue must be identified in the Infrastructure Plan by the plan-maker and ideally resolved before then. If the relevant water company cannot guarantee the connections required then this is a serious issue and one that CPBC must raise this with the Environment Agency, not</p>							every five years a Water Resources Management Plan (WRMP) to ensure just this. This is set out in sections 37A to 37D of the Water Industry Act 1991. This plan is approved by the Environment Agency, and ultimately by Defra. The WRMP cannot be approved unless the water company can provide the assurance that the needs of the development plan system can be supported. To ensure this, the water company must take into account the future development requirements of the local authority.		

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											<p>pass on to applicants to resolve.</p> <p>As paragraph 194 of the NPPF states: “The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”</p>										
03410020	Organisation	Jane t	Nuttal	Natural Engalnd		SD9	Yes	Natural England welcomes the requirements for new development to incorporate water efficiency measures and	Yes							A	Natural England welcomes the requirements for new development to incorporate water efficiency measures and achieve stringent standards. Useful reference can be made to the recently published Shared	Reps to SD9 and supporting text as agreed with Essex County Council and set out in the Schdeule of Mods and Natural England SoCG.	Y		

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								achieve stringent standards. Useful reference can be made to the recently published Shared Standards for Water Efficiency in Local Plans. The Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full									Standards for Water Efficiency in Local Plans. The Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It is your authority's responsibility to determine that the Local Plan meets the statutory obligations for nature recovery, set out in Annex D of the Standards. We advise that implementation of the recommendations in the Shared Standards are one way for your authority to		

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								endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It is your authority's responsibility to determine that the Local Plan meets the statutory obligations for nature recovery, set out in Annex D of the Standards. We advise that implementation of the recommendations in the									meet its nature recovery and protection obligations, in relation your plans for growth and water scarcity. This includes undertaking an integrated water cycle study to inform the local plan and assess the need for the water efficiency measures in your LPA area to address the impacts of growth on nature recovery obligations. Recommended policy wording around water efficiency, for inclusion in Local Plans, is set out in the Shared Standards. We support the policy requirement that all new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development.		

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								Shared Standards are one way for your authority to meet its nature recovery and protection obligations, in relation your plans for growth and water scarcity. This includes undertaking an integrated water cycle study to inform the local plan and assess the need for the water efficiency measures in your LPA area to address the impacts of									The policy stipulates that this must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.		

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								growth on nature recovery obligations. Recommended policy wording around water efficiency, for inclusion in Local Plans, is set out in the Shared Standards. We support the policy requirement that all new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time											

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								to serve the development. The policy stipulates that this must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.											
10270011	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	SD9	Yes		No	Effective	Point 4 of Policy SD9 is not sound. It requires that 'All new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.' However, Water Companies have an obligation under the Water Industry Act to connect to the public	Delete part 4.	No	Not Answered		A	Point 4 of Policy SD9 is not sound. It requires that 'All new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development. This must	Noted	N

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											<p>sewerage network, subsection (1) of Section 106 reads: 106 Right to communicate with public sewers (1) Subject to the provisions of this section— (a) the owner or occupier of any premises, or (b) the owner of any private sewer which drains premises, shall be entitled to have his drains or sewer communicate with the public sewer of any sewerage undertaker and thereby to discharge foul water and surface water from those premises or that private sewer.</p> <p>Therefore, Policy SD9 it is not sound - Part 4 is not necessary or effective, and it should be deleted.</p>						include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.' Therefore, Policy SD9 it is not sound - Part 4 is not necessary or effective, and it should be deleted.		

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0282-0079	Organisation	Kevin	Fraser	Essex County Council	Yes	SFRA	Not Stated		No	Effective	<p>ECC seek the Strategic Flood Risk Assessment (SFRA) is reviewed to take account of a number of technical matters including a climate change allowance of 45% rather than 40% consistent with Environment Agency guidance and the ECC SuDS Design Guide; identify whether sites are located in a Critical Drainage Area; seek to provide for rainwater harvesting, where possible; reflect acceptable discharge rates; provide betterment to reduce the risk of downstream flooding; and reference the Sustainable Drainage Systems Design Guide for Essex (2020), which is in line with the national CIRIA SuDS Manual.</p> <p>Site assessment proformas have been prepared for sites that have been identified to be within Flood Zone 2 and/or Flood Zone 3 or have access routes within the Flood Zones. The proformas should refer to a climate change allowance of 45% rather than 40% consistent with Environment Agency guidance. The Essex SuDS Design Guide, prepared by the LLFA, expects the Upper End climate change allowances to be used depending on the catchment area. This Upper end allowance for peak rainfall intensity in small and urban catchments (Combined Essex, South Essex) is 45% total percentage change</p>	<p>Reference should be made to a climate change allowance of 45% rather than 40% consistent with Environment Agency guidance and the Essex SuDS Design Guide.</p> <p>ECC seek the following requirements to be required for all potential development sites:</p> <ul style="list-style-type: none"> • Sites should be identified as being located within a Critical Drainage Area, and should have permeable hardstanding surfaces and the provision of rainwater harvesting, where possible. • All sites should provide source control of surface water and should consider the conveyance hierarchy as per the updated SuDS Guidance Document. • Sites in Critical Drainage Areas should discharge at the 1in1 Greenfield rate 	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Require the SFRA to be updated to include a climate change allowance of 45% rather than 40% and to identify whether sites are located in critical drainage areas and reference Sustainable Drainage Systems Design Guide for Essex (2020). LLFA provided a list of some specific sites to review including: Richmond Ave Car Park, Knightswick Shopping Centre, Canvey Library and Barclays, Grouts and Land to the Rear, Land above The Paddocks, Oak Road Car park, Venables Close, Canvey Job Centre, Former Admiral Jellicoe, Land to the Rear of North Avenue Essex Coachworks Former Council Offices, Corner of Little Gypps and Willow Close, Ozonia</p>	<p>The SFRA has been updated to resolve all issues aside from including a climate change allowance of 45%. This is currently ongoing. CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the SFRA, will be considered by an independent Inspector appointed to examine the Plan and will continue to work together to address outstanding matters as far as possible.".</p> <p>The SFRA has been updated to identify sites which are located in a critical drainage area with reference to the guidance provided in the Sustainable Drainage Systems Design Guide for Essex (2020) The Level 2 SFRA has been updated with the 45% peak rainfall intensity, The Level 2 SFRA has been updated to consider sites within critical</p>	

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											<p>anticipated for the 2050s (a lifetime up to 2060). This is consistent with the Environment Agency guidance as set out in the EA Peak rainfall intensity allowance.</p> <p>The SFRA should also identify which sites are located within a Critical Drainage Area (CDA) as set out below:</p> <ul style="list-style-type: none"> • Richmond Ave Car Park - refer to a climate change allowance of 45%. The site is located within a CDA. a drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. • Knightswick Shopping Centre - refer to a climate change allowance of 45%, the northern part of the site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. • Canvey Library and Barclays - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. • Grouts and Land to the Rear - refer to a climate change allowance of 45% The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of 	<p>for all events up to the 1in100 event plus climate change.</p> <ul style="list-style-type: none"> • Where sites have a surface water flow path consideration should be given as to what betterment can be provided to reduce the risk of downstream flooding. • Reference should be made to the Sustainable Drainage Systems Design Guide for Essex (2020), which is in line with the national CIRIA SuDS Manual. It provides details of the standards and guidance on the planning, design and delivery of attractive and high-quality sustainable drainage systems (SuDS) schemes providing multiple benefits to the environment and community. 					<p>Gardens, Eastern Esplanade, Land between Station Rd and Seaview Road, Matrix House, Lionel Rd, Kushi, Furtherwick Road</p> <p>Require the upper end allowance of 45% for peak rainfall intensity to be used within the Level 2 SFRA</p> <p>Potential development sites should identify whether the site is within a critical drainage area and provide criteria as outlined in Sustainable Systems Design Guide for Essex (2020). All sites should consider sources of surface water and provide controls.</p>	<p>drainage areas and for the control surface water sources to be considered.</p>	

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											<p>hardstanding should be required to be permeable.</p> <ul style="list-style-type: none"> • Land above The Paddocks – if the site is an upward extension to the building then a drainage strategy will not be required given there would be no increase in hardstanding. • Oak Road Car park - the drainage strategy will be required to evidence how the pools of surface water will be dealt with and ensure any development does not increase flood risk elsewhere. • Venables Close - refer to a climate change allowance of 45%. If development is built on the area of surface water flood risk the drainage strategy will be required to evidence how that surface water will be managed and should not increase flood risk elsewhere. • Canvey Job Centre - refer to a climate change allowance of 45%. • Land at the Point - refer to a climate change allowance of 45%. Any development within the flood zones should evidence how surface water will be managed. • Former Admiral Jellicoe - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. • Land to the Rear of North Avenue - refer to a climate change allowance of 45%. 												

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											<p>Where there are areas of surface water flooding a drainage strategy must evidence how these will be dealt with without increasing the risk of flooding elsewhere.</p> <ul style="list-style-type: none"> • Essex Coachworks - refer to a climate change allowance of 45%. • Former Council Offices, Long Road - refer to a climate change allowance of 45%. • Corner of Little Gypps and Willow Close - refer to a climate change allowance of 45%. The drainage strategy should evidence how surface water flows will be managed. • Ozonia Gardens, Eastern Esplanade - refer to a climate change allowance of 45%. A Drainage strategy should evidence how surface water will be dealt with. Discharge to the sea can be at unrestricted rates. • Land between Station Rd and Seaview Road - refer to a climate change allowance of 45%. The drainage strategy should evidence how surface water will be managed. Discharge to the sea can be unrestricted. • Matrix House, Lionel Rd - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. • Kushi, Furtherwick Road - refer to a climate change allowance of 45%. The site is 												

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											located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. The Essex SuDS Design Guide , prepared by the Lead Local Flood Authority (LLFA), expects the Upper End climate change allowances to be used depending on the catchment area. This Upper end allowance for peak rainfall intensity in small and urban catchments (Combined Essex, South Essex) is 45% total percentage change anticipated for the 2050s (a lifetime up to 2060). This is consistent with the Environment Agency guidance as set out in the EA Peak rainfall intensity allowance. 3. Effective Paragraph 4.1.2 sets out the requirements for all potential development sites. Additional bullets should include whether a site is located within a Critical Drainage Area (reference to permeable hardstanding and rainwater harvesting); all sites should provide source control of surface water and should consider the conveyance hierarchy; sites in CDAs should discharge at the 1in1 Greenfield rate for all events up to the 1in100 event plus climate change;. sites with a surface water flow path should consider what betterment can be provided to reduce the risk of downstream flooding; and												

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											regard should be had to the Sustainable Drainage Systems Design Guide for Essex (2020) in terms of the LLFA design standards which are in line with the national CIRIA SuDS Manual.									

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0947007	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	SLAA	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consider	No	Positively prepared, Justified, Consistent with national policy	<p>The suitability of sites considered the physical circumstances of sites and policies set in the NPPF. There are 24 criteria that were used and ranged from statutory designations, Flood Risk Zones, accessibility to public transport (distance to bus stops) and noise. Very important criteria were awarded a 3 score and the least important awarded a 1 score. The full list is on pages 5-6 of the report.</p> <p>The SLAA (July 2025) confirms that land east of Rayleigh Road, Thundersley (Site ID 40492) is suitable, viable and available for residential development, with an indicative capacity of between 962 and 1,604 dwellings depending on assumed density. The site scores positively across the majority of assessment criteria, with no insurmountable constraints identified. Matters raised including proximity to a Local Wildlife Site, the presence of badger setts, Tree Preservation Orders, and heritage/archaeology considerations are all capable of being addressed through established and recognised forms of mitigation at the planning application stage (indeed, this was recognised by statutory consultees in relation to the previous planning application on the site – 23/0085/OUT).</p> <p>The Council's evidence base</p>		Yes	Not Answered	Yes	A	<p>In respect of site "land east of rayleigh road" (ID 40492) known as GB13 the Slaa identifies that the site is suitable, viable and achievable which is not consistent with the transport assessment of the sustainability appraisal. Concern that the larger site was assessed to make it seem like it was undeliverable.</p>	<p>The purpose of the SLAA is not to create the strategy for the Plan, it is part of the technical evidence base for the Castle Point Plan which complements other important sources of information such as public consultation and the Sustainability Appraisal. Together these sources of evidence inform the strategic planning decision-making process. Therefore, the SLAA is not the sole source of evidence. The Castle Point Plan I Strategic Land Availability Assessment (SLAA) - July 2025 does not inform which sites should be allocated for development, but instead it contributes to the Council's understanding of what land is developable. The Green Belt assessment 2025 further assessed sub sections of sites to build upon the earlier greenbelt evidence produced in 2018. This found that in respect of sub-</p>	N

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								ation within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In			in respect of site GB13 is inconsistent and therefore unsound. The SLAA identifies the site as available, suitable, and achievable, with no indication that access or transport constraints would render the site unsuitable for allocation. However, the Transport Assessment presents the site in a markedly negative light, identifying highways and access issues that are not carried through or reflected in the SLAA, Sustainability Appraisal, or wider site selection process. This discrepancy undermines the robustness of the evidence base and suggests that the site has not been assessed in a fair or consistent manner when compared with other potential allocations. The Council's evidence base (SLAA 2025, Benfleet/Hadleigh/Thundersley/Daws Heath – Site Assessments) identifies a smaller parcel, GB13a (East of Rayleigh Road), which more closely aligns with the area being promoted by the developer. Importantly, this assessment demonstrates that GB13a performs significantly better than the wider GB13 parcel, achieving a higher unmitigated suitability score of 61. The assessment finds the site to be Viable, Available (subject to confirmation), and Developable, and records that all identified constraints (such								areas GB 13 the assessment has concluded that the full extent of the sub-area is not recommended for further consideration. However, it is concluded that part of the sub-area can be recommended for further consideration given that this reduced part of the sub-area would result in reduced potential harm to the Green Belt. This is further detailed within the report.	

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								addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and			as drainage, TPOs, and archaeology) are readily mitigable through established design measures (e.g. SUDS, tree protection, archaeological recording). This contrasts with the wider GB13 assessment, which overstates harm by considering a larger parcel not reflective of the developer's intentions. The SLAA also recognises that the site could deliver between 429 and 715 dwellings at standard densities, representing a meaningful contribution to the borough's housing need. The Council's own evidence therefore supports the conclusion that GB13a is both a suitable and realistic development option. The SLAA awards GB13a mid-level scores for both "Service Accessibility" and "Sustainable Accessibility," confirming that the site is within walking distance of some services and within 800m of a bus stop served at least hourly. These scores indicate that transport access is reasonable and capable of improvement through standard mitigation. However, the Transport Assessment presents the site as severely constrained, without reconciling this with the SLAA findings or exploring mitigation. This inconsistency undermines the robustness of the evidence base and suggests that transport constraints have been									

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								Essex County Council (ECC) in relation to land north west of Thunder sley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbo			selectively emphasised to discount the site.								

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								urs regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation.											

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								Indeed, paragraph 28 of the NPPF states, "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these."											

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								The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as											

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								<p>an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities.</p> <p>It is noted within the officer's report to Special Council (for the meeting on 23 July 2025) that "The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept</p>												

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								any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.” However, it is important to note paragraph 26 of the NPPF which stipulates,											

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								“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a											

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								<p>particular area could be met elsewhere.”</p> <p>The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic</p>											

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								policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.											

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10130001	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SP1	Yes		Yes		<p>Anglian Water supports the policy requirements regarding new opportunities for green and blue infrastructure (GBI) and the multi-functional benefits well designed GBI can bring to existing and new communities, particularly in terms of climate resilience and minimising the impacts of pollution - including improved water quality.</p> <p>A successful trial by Anglian Water in partnership with Essex County Council, led to Park Avenue becoming the first street in Essex to have new "rain gardens" installed in 2021 to help reduce the risk of flooding. These are attractive Sustainable Urban Drainage Systems (SuDS) - that help retain water and allow it slowly to soak away and holding surface water away from the road and people's homes. Thirty native trees were planted in the greenspace, and over 1,300 plants in the rain gardens to help to reduce localised flooding in the area and provide an environmentally positive solution for the local community.</p> <p>In addition, Anglian Water has delivered a new mycelium wetland at Benfleet water recycling centre (WRC), in partnership with the University of Essex who will be</p>		No	Not Answered	Not Answered	A	<p>Anglian Water supports the policy requirements regarding new opportunities for green and blue infrastructure (GBI) and the multi-functional benefits well designed GBI can bring to existing and new communities, particularly in terms of climate resilience and minimising the impacts of pollution - including improved water quality.</p> <p>Anglian Water have completed successful trials in partnership with Essex County Council, installing "rain gardens" SuDS help reduce the risk of flooding. In addition, Anglian Water has delivered a new mycelium wetland at Benfleet water recycling centre (WRC), in partnership with the University of Essex who will be monitoring</p>	Support noted	N

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											<p>monitoring the performance of this innovative wetland design. This wetland is designed to treat settled storm discharge from the WRC using nature-based solutions that increase biodiversity, improve water quality, and reduce the algal bloom to allow the protected salt marshes (Ramsar and SSSI sites) to thrive. Further information can be found here: https://www.catchmenttoeast.co.uk/places/benfleet-creek/</p> <p>We therefore endorse the creation of GBI either retrofitting in existing communities as part of redevelopment and urban regeneration opportunities and creating GBI in new developments. Our Advanced WINEP investment for AMP8 aims to demonstrate an approach to maximise value by going even further for the environment through partnership working (including leveraging significant partnership funding), focus on the use of nature-based solutions, implementing solutions to water management challenges at scale, and improved multi-stakeholder governance.</p> <p>The ways of working development through the partnership centre of</p>						<p>the performance of this innovative wetland design.</p> <p>Anglian Water therefore endorse the creation of GBI either retrofitting in existing communities as part of redevelopment and urban regeneration opportunities and creating GBI in new developments.</p>		

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											excellence will be applied to the delivery of our overflows WINEP obligations in Great Yarmouth and Southend. We are aiming to deliver 100% green solutions in partnership - achieving both positive overflow outcomes and wider benefits such as flood mitigation. It is hoped that learning from A-WINEP can be applied to other areas in the future, to demonstrate that partnership funding opportunities can provide significantly greater social, environmental, and economic benefits to an area.									
0360006	Organisation	Marlene	Curtis	British Horse Society		SP1					The Belfairs Nature Reserve The writer enjoyed riding through the Nature Reserve from mid 1940s to mid 1970s via the open link with the Belfairs Trotting Track, via Warren Road and via The Woods access adjacent to Greenacres Farm, where the writer's pony was kept prior the farm's sale for housing development. No notices banning riding existed and the warden once informed which track to ride to see fox cubs playing. Also enclosed are copies of two letters received, one dated 1982 from Valerie Perkins who describes her use, and of others, being in				See attachment	B	Previous enjoyment of riding through the Nature Reserve from mid 1940s to 1970s. See attached submissions supporting this. Difficult to understand why Reserve is fully within the boundary of Castle Point Borough but is managed by Southend Council who	The Belfairs Nature Reserve is located outside the administrative area of Castle Point. This is located within the administrative area of Southend-on-Sea City Council.	N	

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											<p>full sight of the warden; that wildlife is never frightened by horses but are disturbed by dogs; that she wished to see again safe places open to riders to prevent the necessity of using highways and that she couldn't understand why the less used tracks should not be available to riders again. She also states that horse droppings are beneficial in the ecological cycle (we add that bugs and especially the Dung Beetle consider droppings a "Sunday lunch"). The second copy letter from D. Smith to ECC confirms that on school trips to the Reserve for nature studies during 1958 - 1963 she saw horse riders using the Reserve's various paths on many occasions. In Oliver Rackham's ancient woodland book "The Woods of South-East Essex" the numerous double pecked tracks through the Reserve are recorded as "Road or woodland ride". The enclosed 1996 photo informs of a "Ride" closed for woodland work where tracks of vehicles are also very evident. (Encs. 2 copy letters and photo.)</p> <p>We also find it difficult to understand when the Reserve is fully within the boundary of Castle Point Borough that it is managed by Southend Council who have banned access to horse riders and cyclists. Especially when the book "Leigh-on-Sea - A history" by Judith Williams on Pg. 102 informs "In 1938 Southend purchased over 40</p>							have banned access to horse riders and cyclists. Southend Council byelaws – must be reasonable, consulted upon (BHS were not consulted) and consistent with general law. Home Office Model Byelaws to consider which state byelaws should not discriminate unfairly against one section of the community and justification is needed if byelaws are imposed on acreages above 10 acres - which certainly applies to the 92 acres of the Nature Reserve. The Reserve has numerous rides - the longest encircling the boundary passing 6 access points within which another 5 rides traverse in all directions. Riding ban conflicts with Forestry England March 2025		

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											<p>acres of Belfairs Great Wood in conjunction with Ben fleet Urban District Council and Essex County Council with the aim to create an area of Nature Reserve and for this purpose £1,000 was raised by voluntary subscription". A further 52 acres were added in 1947 and known use by horse riders was from 1939 until late 1970s when the booklet "The Wildlife and History of Belfairs Nature Reserve" states they got blamed for "churning up and destroying ground flora and are also an inconvenience to walkers". While we consider the latter reason to be invalid, the former reason is totally incompatible with the continuous motorised use of Rides to carry out rotational coppicing. The booklet also records the 1986 laying of a new sewer involving a 40' wide swathe of churned-up subsoil and replaced top soil that, within two years, resulted in 38 new colonisers along the sewer line, 28 of which previously had been unrecorded.</p> <p>Southend Council byelaws: We understand byelaws banning both riders and cyclists from the Reserve were introduced "by declaration on 22.10.81." and confirmed by the Department of the Environment in October 1993. However, in law byelaws must be reasonable, consulted (the BHS was not consulted) and consistent with general law and not imposed just because a mischief is feared. There are</p>						Access Review states horse riders will be able to enjoy hacking in 49 more woodlands across England without riders needing a permit. Request local riders to be able to enjoy reinstatement of riding access in the Nature Reserve within a very short time.		

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											<p>also the Home Office Model Byelaws to consider which state byelaws should not discriminate unfairly against one section of the community and justification is needed if byelaws are imposed on acreages above 10 acres - which certainly applies to the 92 acres of the Nature Reserve. The Reserve has numerous rides - the longest encircling the boundary passing 6 access points within which another 5 rides traverse in all directions.</p> <p>Further, the riding ban conflicts with Forestry England (the nation's largest land manager caring for 1500 woods and forests across England) when their March 2025 Access Review states horse riders will be able to enjoy hacking in 49 more woodlands across England without riders needing a permit, while still protecting sensitive habitats, maintaining safe access for all and giving greater freedom for riders to explore our countryside. Forestry England's Chief Executive said the decision reflected their commitment for the nation's forests to be as welcoming and available as possible, including for the equestrian community. We request that local riders will similarly be able to enjoy the reinstatement of riding access in the Nature Reserve within a very short time.</p>												

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0823-0001	Organisation	Pat	Abbot	Environment Agency	Yes	SP1	Yes		Yes		<p>Policy 1.1 - We support policy SP1.1 – in particular, providing protection and enhancement to the areas of particular importance to biodiversity, Policy 1.2 - We support SP1.2, In addition, the biodiversity benefits and natural flood management opportunities could be incorporated into the reasoned justification. The council should resist proposals that lead to a decrease in the provision and quality of, and fails to enhance, the status of green and blue infrastructure, in accordance with the Water Framework Directive. Paragraph 6.11 - We strongly support the reasoned justification for Policy SP1, included in paragraph 6.11, which mentions the 15% uplift on standard biodiversity units and recognises the importance of the blue/green infrastructure network.</p>	<p>Policy 1.1 - We support policy SP1.1 – in particular, providing protection and enhancement to the areas of particular importance to biodiversity, Policy 1.2 - We support SP1.2, In addition, the biodiversity benefits and natural flood management opportunities could be incorporated into the reasoned justification. The council should resist proposals that lead to a decrease in the provision and quality of, and fails to enhance, the status of green and blue infrastructure, in accordance with the Water Framework Directive. Paragraph 6.11 - We strongly support the reasoned justification for Policy SP1, included in paragraph 6.11, which mentions the 15% uplift on</p>	No	Not Answered	Not Answered	A	Support policy SP1	Support noted.	N

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												standard biodiversity units and recognises the importance of the blue/green infrastructure network.							
02820003	Organisation	Kevin	Fraser	Essex County Council	Yes	SP1	No	3. Effective ECC support the delivery of the ELNRS, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the ELNRS. The ELNRS helps to identify areas for habitat creation and enhancement; prioritise areas for action; support and	No		Whilst the ambition to 'safeguard' Strategic Combined Opportunity Areas is welcomed, the formal weighting of the ELNRS within the planning system is still to be defined, pending further government guidance. However, ELNRSs do provide a statutory framework, requiring public authorities to have regard to them in decision-making, as set out in Planning Practice Guidance (PPG). They offer a clear, evidence-based understanding of local opportunities for nature recovery, which can inform planning policies and decisions. To avoid weakening policy wording while awaiting clarity on the ELNRS's formal status, ECC seek the term 'safeguarded' is removed from the policy and replaced with the phrase '...development proposals are designed to enable and support the habitat priority measures identified within Strategic Combined Opportunity Areas'. This would provide consistency with other policies in the Plan, regarding Canvey (Policy C1, C4, C6, C8 and C9); South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2,	Essex County Council is the Waste Planning Authority for Castle Point Borough, and the Essex and Southend-on-Sea Waste Local Plan (WLP) July 2017 forms part of the Statutory Development Plan for the borough and should be read alongside the Castle Point Plan. The WLP designates Waste Consultation Areas (WCAs) at a distance of 250m around permitted and allocated waste management facilities or within 400m of a Water Recycling Centre. A Waste Infrastructure Impact Assessment will be required for any development within these	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports policies to deliver the ELNRS through the local plan but queries the weight given to Strategic Combined Opportunity Areas within the local plan. Considers that the word "safeguarding" implies that Strategic Combined Opportunity Areas have the same weighting as statutory designations, including the APIBs. ECC request replacing the word "safeguard" with "enable and support". Supports this policy criteria but recommends referencing "urban greening" to ensure nature recovery and	Not Accepted. The Council has a legal duty to have regard to the relevant Local Nature Recovery strategy for their area within their local plans. Paragraph 192 (a) of the NPPF states that plans should identify, map and safeguard areas identified by national and local partnerships for habitat management, enhancement, restoration or creation... it then goes on to say that (Local Planning Authorities) "should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance. " This position is further	1.... Ensuring those areas identified as Strategic Combined Opportunity Areas are safeguarded protected and enhanced to deliver the additional nature benefits identified to create new connections between habitat areas; 2. Identifying new urban greening opportunities within and adjacent to the existing urban areas to deliver multi-functional green

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								<p>promote nature recovery ; and deliver coordinated action for biodiversity and climate resilience</p> <p>The ELNRS includes two key map types:</p> <ul style="list-style-type: none"> • Areas of Particular Importance for Biodiversity (APIBs): Nationally and locally designated sites. • Opportunities Mapping : Strategic Opportunities – Areas with potential 			<p>Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1-Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites. ECC support the focus of the policy on identifying new opportunities within and adjacent to existing urban areas to deliver multi-functional green infrastructure that enhances nature, habitat resilience, and climate resilience. However, ECC seeks the wording includes reference to `urban greening`, as this will help ensure that nature recovery and climate resilience are embedded across all parts of the borough, not just in peripheral or undeveloped areas. ECC support reference to the Essex Green Infrastructure Strategy and GI Standards in paragraph 6.5 as evidence of South Essex's environmental quality. However, the ELNRS also provides robust, evidence-based support for this and should be referenced here, as well as in paragraph 6.10. The ELNRS identifies priority areas and opportunities for nature recovery, making it highly relevant to the overall environmental context of the plan. The ELNRS should not be seen as the sole mechanism for meeting the biodiversity duty under the NERC Act 2006. While the ELNRS is a significant and statutory consideration, it is</p>	<p>thresholds to ensure there is no adverse impact on their existing or future operation.</p>					<p>climate resilience is embedded in urban areas as well as undeveloped areas. Supports the reference to Essex Green Infrastructure Strategy and GI standards. Points out that the ELNRS identifies priority areas as well. Typo missing “t” on requirement The ELNRS is one tool of a number which contribute to the biodiversity duty Supports the view that Green Belt has wider benefits from preventing urban sprawl, it also supports nature conservation and delivery of green and blue infrastructure and references Kirby Scott and Walsh study Landscape and Urban Planning March 2025</p>	<p>supported by Section 40 & 41 of the NERC Act 2006. Essex LNRS map identifies that large areas of Castle Point are areas of particular importance to Biodiversity (APIB), particularly around Canvey Island. Further inland there are various isolated APIBs which are Local Wildlife sites and Ancient Woodland. The strategic combined opportunity areas connect these APIBs to form nature corridors through habitat creation The Essex Biodiversity Net Gain Evidence for Need Aug 2024 refers to the difficulties that isolated designated sites have in surviving with many being in poor condition. These include the decline of woodland and woodland birds in Essex and the loss of Local Wildlife sites (LoWS), the study cites one large LoWS in Castle Point which was lost to residential</p>	<p>infrastructure that provides nature-based enhancements, habitat resilience and climate resilience It also has a key role to play in the overall quality of the environment in South Essex as evidenced by the Essex Local Nature Recovery Strategy, South Essex Green and Blue Infrastructure Strategy, Essex Green Infrastructure Strategy and Green Infrastructure Standards and the associated proposals for the SEE</p>

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								for habitat creation (e.g. woodland, grassland, scrub, freshwater, coastal and marine). Potential Opportunities – Urban and other areas where habitat creation could be beneficial. APIs are not included within the opportunities mapping. Therefore, the Strategic Combined Opportunity Areas are not statutory designat			one of several tools that support this duty. Fulfilling the biodiversity duty requires a broader approach that includes integrating biodiversity across planning, land management, and decision-making. Therefore, while the ELNRS is a valuable resource, it should be seen as part of a wider suite of strategies and actions that contribute to meeting the biodiversity duty. We welcome the recognition of the Green Belt wider benefits beyond preventing urban sprawl, particularly in supporting nature conservation and the delivery of green and blue infrastructure. This broader view aligns with the NPPF (2024), paragraphs 156(C) and 159, which highlights the importance of enhancing green spaces to improve landscape character, support nature recovery, and meet local or Natural England standards for Accessible Green Space and Urban Greening Factor provision. To support this approach, the study “A Greener Green Belt? Co-developing Exploratory Scenarios for Contentious Peri-Urban Landscapes” by Kirby, Scott, and Walsh may be of interest. It explores future scenarios for England’s Green Belts, including a shift toward multifunctional landscapes that balance development pressures with climate resilience, biodiversity, and public								development in 2022. It concludes that strategic opportunity areas will provide the most benefits for nature recovery over onsite biodiversity improvements (those within the red boundary), where quality would be compromised. Castle Point is a small borough of approximate 17 square miles with a population density of circa 5000 per square mile, consequently its biodiversity uplift opportunities are more limited than other local authority areas. In response to the current guidance already referred to CPBC considers that the connections provided by the Strategic Opportunity Areas are important for isolated APIs to survive and should therefore be “safeguarded” in order for the Council to meet its biodiversity duty in demonstrating improvements	Park. Remove school playing fields from open space designation Proposed text amendment to criteria 1 Ensuring those areas identified as Strategic Combined Opportunity Areas are safeguarded protected and enhanced to deliver the additional nature benefits identified to create new connections between habitat areas; “protect and enhance” should replace `enable and support’ in policies C1, C4, C6, C8 & C9

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								ions, so do not have the same weighting, but they are strategic priorities for investment and coordinated action. The ELNRS encourages local authorities and partners to focus efforts in these areas to maximise impact. These areas are intended to deliver the greatest combined benefits for biodiversity, climate resilience, water manage			wellbeing. The study highlights a growing consensus around the need for Green Belts to evolve into strategic urban support landscapes that deliver multiple environmental and social benefits. https://researchportal.northumbria.ac.uk/en/publications/a-greener-green-belt-co-developing-exploratory-scenarios-for-cont							within the Borough. The policies Canvey (Policy C1, C4, C6, C8 and C9); South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1- Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites will be amended to be consistent with SP1 Criteria 1 Accepted: The Council considers that finding opportunities for biodiversity improvements within Castle Points Urban Areas is important for nature recovery, climate resilience and community wellbeing. Accepted: The Council agrees that the ELNRS is an important document in identifying opportunities for improving the natural environment and	etc. South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1- Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites.

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								ment, and public wellbeing. They aim to connect fragmented habitats and support the Nature Recovery Network.										works in tandem with the Essex Green Infrastructure Strategy and GI Standards Noted and Corrected: Noted. The Council agrees that there are a number of tools which contribute to meeting the biodiversity duty, the ELNRS is the most significant one. Noted: The Council agrees that the Green Belt provides for wider benefits	
10200002	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SP1	No		No	Justified, Consistent with national policy	In part 1 of this policy the Council state that in supporting the delivery of the Essex Local Nature Recovery Strategy (LNRS) they will ensure that those areas identified as Strategic Combined Opportunity Areas are safeguarded to deliver additional nature benefits identified to create more connections between habitats areas. While the HBF does not disagree with the principles of identify specific locations where nature recovery can be delivered the Council are using this as a means of preventing new development. What appears to have been ignored by the Council is that the strategic creation opportunities mapped as part of preparing the LNRS do not currently have any particular	HBF would suggest point 1 of SP1 is amended as follows: Supporting the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the Strategy and focusing any delivery of biodiversity net gains to those areas that hold the greatest	Yes	Not Answered	Yes	A	In part 1 of this policy the Council state that in supporting the delivery of the Essex Local Nature Recovery Strategy (LNRS) they will ensure that those areas identified as Strategic Combined Opportunity Areas are safeguarded to deliver additional nature benefits identified to create more connections between habitats areas.	As set out in paragraphs 6.10 and 6.11, the LNRS identifies the most significant areas of priority habitat across Essex, and identifies those areas where enhancements are necessary to improve the network and deliver an overall gain in nature. The sites identified for protection and enhancement in the LNRS cover a significant extent of the Green Belt in Castle Point. Majority of the undeveloped areas of the Borough are	N

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											<p>importance with regards nature and biodiversity with LNRS stating on page 30 that “the strategic creation opportunity maps do not contain areas of particular importance for bio-diversity”. These are not areas to be safeguarded but areas where the delivery of biodiversity net gains should be focused in order to maximise the benefits. Rather than being used as a reason for restricting development it will be new development, through the delivery of statutory Biodiversity Net Gains, that will ensure opportunities for nature improvement are delivered in the manner envisioned by the LNRS. The need to balance the provision more homes with nature recovery and other matter is considered in more detail below, however in order to be effective and consistent with the NPPF, HBF would suggest point 1 of SP1 is amended as follows:</p> <p>Supporting the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the Strategy and focusing any delivery of biodiversity net gains to those areas that hold the greatest potential to deliver benefits for nature.</p>	potential to deliver benefits for nature.					While the HBF does not disagree with the principles of identify specific locations where nature recovery can be delivered the Council are using this as a means of preventing new development. What appears to have been ignored by the Council is that the strategic creation opportunities mapped as part of preparing the LNRS do not currently have any particular importance with regards nature and biodiversity with LNRS stating on page 30 that “the strategic creation opportunity maps do not contain areas of particular importance for bio-diversity”. These are not areas to be safeguarded but areas where the delivery of biodiversity net gains should be focused in order	identified as being a Strategic Combined Opportunity Area, which identify the top locations and opportunities across all habitats. These areas have the greatest potential to deliver benefits for nature and the broader environment. These areas will also benefit from a 15% uplift on standard biodiversity units, as calculated in the biodiversity metric for biodiversity net gain. These areas are critical to the blue and green infrastructure network across the Borough.	Policy has been amended to state "protect and enhance" instead of "safeguard" as per ECC reps	

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																	<p>to maximise the benefits. Rather than being used as a reason for restricting development it will be new development, through the delivery of statutory Biodiversity Net Gains, that will ensure opportunities for nature improvement are delivered in the manner envisioned by the LNRS. The need to balance the provision more homes with nature recovery and other matter is considered in more detail below, however in order to be effective and consistent with the NPPF, HBF would suggest point 1 of SP1is amended as follows:</p> <p>Supporting the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to</p>		

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																	<p>the Areas of Particular Importance for Biodiversity as identified in the Strategy and focusing any delivery of biodiversity net gains to those areas that hold the greatest potential to deliver benefits for nature.</p> <p>HBF would suggest point 1 of SP1is amended as follows: Supporting the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the Strategy and focusing any delivery of biodiversity net gains to those areas that hold the greatest potential to deliver benefits for nature.</p>		

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0341002	Organisation	Jane	Nuttall	Natural England		SP1	Yes	We welcome the support for the delivery of the Essex Local Nature Recovery Strategy (LNRS) and the new opportunities to deliver multi-functional GI and wider benefits. However, please note that protecting coastal areas to enable improved access will need to be delivered sensitively to ensure that the notified interest features of internationally	Yes		The management of any new and enhanced green infrastructure should be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Natural England recommends that green infrastructure delivered within (or associated with) major new developments should be managed, maintained and monitored for a minimum of 30 years					A	Natural England welcome the support for the delivery of the Essex Local Nature Recovery Strategy (LNRS) and the new opportunities to deliver multi-functional GI and wider benefits. However, please note that protecting coastal areas to enable improved access will need to be delivered sensitively to ensure that the notified interest features of internationally important coastal sites are not adversely impacted by additional recreational pressure. We welcome the reference in the supporting text to the 'protection of Habitats Sites identified through international legislation' (6.13, 6.14). The management of any new and enhanced green infrastructure	Modification to Policy SP1 agreed Protecting the function of the Borough's Green Belt and coastal areas by supporting opportunities to enable improved access, health and wellbeing and leisure infrastructure, for the overall enjoyment of residents, subject to sensitive consideration of environmental assets including internationally important coastal sites and ensuring they are not adversely impacted by recreational pressure. 5. The management of any new and enhanced green infrastructure must be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Green infrastructure delivered within (or associated with) major new developments should be managed,	Y - Modification to Policy SP1 agreed Protecting the function of the Borough's Green Belt and coastal areas by supporting opportunities to enable improved access, health and wellbeing and leisure infrastructure, for the overall enjoyment of residents, subject to sensitive consideration of environmental assets including internationally important coastal sites and ensuring they are not adversely impacted by recreation

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								important coastal sites are not adversely impacted by additional recreational pressure. We welcome the reference in the supporting text to the 'protection of Habitats Sites identified through international legislation' (6.13, 6.14).									should be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Natural England recommends that green infrastructure delivered within (or associated with) major new developments. should be managed, maintained and monitored for a minimum of 30 years[1]	maintained and monitored for a minimum of 30 years in accordance with Natural England's GI Strategy Standard.	al pressure. 5. The management of any new and enhanced green infrastructure must be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Green infrastructure delivered within (or associated with) major new developments should be managed, maintained and monitored for a minimum of 30 years in accordance with Natural England's GI Strategy Standard.

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09370001	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 policy acknowledges that desire.		Not Answered	Not Answered	Not Answered	A	Supports policy SP1	Support noted.	N
03230001	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				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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												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 Capacity Study to inform policy.								
14400024	Organisation	Joseph	Beale	RSPB	Yes	SP1	Yes		No	Justified	This Policy has many welcome parts. However, small tweaks in Policy could see nature easily woven into the development policies as 'nature enhancements' that would make a big difference in total. The urban-first approach to development is welcome, as is the emphasis on corridors and connectivity, and the embedding of the Essex Local Nature Recovery Scheme (LNRS) throughout the document. There is a need for an additional objective or clarity around how nature fits with the vision and the objectives. There is no mention of the RAMS strategy or protection of sensitive sites from recreational disturbance. 6.9 - in the first sentence there is a typo: 'requirement' is missing the letter t. Section 6.13. there is mention	Small additions throughout could be added to Policy to include: Swift boxes/bricks, sandy flower beds with well thought through planting for pollinators, some green roofs on large retail units, increased tree and shrub cover where appropriate, and well designed SUDS/pond/water storage features; together these measures would make a big difference. Another addition to this Policy	No				This Policy has many welcome parts. However, small tweaks in Policy could see nature easily woven into the development policies as 'nature enhancements' that would make a big difference in total. The urban-first approach to development is welcome, as is the emphasis on corridors and connectivity, and the embedding of the Essex Local Nature Recovery Scheme (LNRS) throughout the	Noted. Recreational disturbance and RAMS is covered in policy ENV3.	Y - Typo in 6.9 corrected. Map on page 21 to be corrected	

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											<p>of recreational impact of residents on protected sites but no mention of mitigation or the RAMS strategy. There is no mention of ensuring habitat quality. Page 21map - the key is confusing with regards to ancient woodland shown on the map. It would also be useful to have habitat quality shown on this map, or whether a site is in or out of management. Brownfield as potentially biodiverse land could be mentioned.</p>	<p>could be improved roadside verge management, similar to that on Roscommon Way, to improve connectivity for invertebrates as per the LNRS aims. There is a need for an additional objective or clarity around how nature fits with the vision and the objectives. There should be mention of the RAMS strategy or protection of sensitive sites from recreational disturbance. 6.9 - the first sentence has a typo: 'requirement' is missing the letter t. Section 6.13. There should be mention of mitigation or the RAMS strategy. There should be mention of ensuring good habitat quality. Page 21 map - the key is confusing with regards to ancient woodland. The</p>					<p>document. There is a need for an additional objective or clarity around how nature fits with the vision and the objectives. There is no mention of the RAMS strategy or protection of sensitive sites from recreational disturbance. 6.9 - in the first sentence there is a typo: 'requirement' is missing the letter t. Section 6.13. there is mention of recreational impact of residents on protected sites but no mention of mitigation or the RAMS strategy. There is no mention of ensuring habitat quality. Page 21map - the key is confusing with regards to ancient woodland shown on the map. It would also be useful to have habitat quality</p>		

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												hatching needs to be consistent with what is shown on the map. It would also be useful to have habitat quality shown on this map, or whether a site is in or out of management. Mention should be made that if a brownfield location is assessed as rich in biodiversity, it should be avoided or appropriate mitigation undertaken, such as green roofs varied substrates in landscaping.					shown on this map, or whether a site is in or out of management. Brownfield as potentially biodiverse land could be mentioned.		
0738003	Organisation	Roy	Warren	Sport England	Yes	SP1	Yes		Yes		The policy is supported due to its focus on protecting and enhancing the Borough's green and blue infrastructure to support health and wellbeing including physical activity. The policy would be consistent with Sport England's Planning for Sport objectives https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance and Government policy in paragraph 96(c) and 104 of the NPPF.		No	Not Answered		A	Supports SP1 and the protection and enhancement of GBI to support wellbeing accords with Sport England Planning for Sport guidance and paragraph 96(c) NPPF	Support noted.	N

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10270001	Agent	c/o agent	c/o agent	Taylor Wimpey c/o Lichfields	Yes	SP1	Yes		No	Effective, Consistent with national policy	<p>Policy SP1 states that ‘the Council will protect and enhance the Borough’s green and blue infrastructure for the benefit of wildlife, biodiversity, landscape, amenity, climate resilience and to support the health, wellbeing and enjoyment of them by residents and visitors’. The supporting text in paragraph 6.5 refers to the high quality of the natural environment across the Borough and 6.7 refers to ‘this rich landscape tapestry is highly valued and should be protected, and where possible enhanced’.</p> <p>However, this general widespread approach goes beyond the NPPF which states in paragraph 187 that planning policies should ‘contribute to and enhance’ the natural and local environment and, more specifically, by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).</p> <p>Further, significantly, paragraph 188 of the Framework states that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with</p>	This ‘blanket’ policy is therefore not Sound, as it is not consistent with the Framework and would not be effective. The policy makes no reference to the hierarchy of nature conservation sites and no distinction as to what ‘green spaces’ require protection through the NPPF and other legislation and which do not. This should be added.	Yes	Not Answered	Not Answered	A	Considers that Policy SP1 is too general and does not distinguish between the hierarchy of international, national and locally designated sites and which green sites require protection	Designated sites are already protected in national policies. SP1 should be read in conjunction with these policies. SP1 also refers to the Essex Local Nature Recovery Strategy which will guide which and how green spaces should be protected and enhanced	N

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											<p>other policies in this Framework.</p> <p>This 'blanket' policy is therefore not Sound, as it is not consistent with the Framework and would not be effective. The policy makes no reference to the hierarchy of nature conservation sites and no distinction as to what 'green spaces' require protection through the NPPF and other legislation and which do not.</p>									
0319-0004	Agent	James	Chapman	Discovery Land and Planning		SP2	No	4. Missed Opportunities Problem: The Council has not audited its own residential land holdings for redevelopment or densification opportunities, particularly low-density estates. It has also not considered managed redevelopment of	No	Not Stated		<p>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</p>			Yes	A	<p>The Council has not audited its own residential land holdings for redevelopment or densification opportunities, particularly low-density estates. It has also not considered managed redevelopment of private gardens despite evidence of significant capacity (800 - 1,600 dwellings depending on assumptions – see Appendix). Why Unsound: Plan has not demonstrated that all reasonable alternatives have been tested, contrary to the NPPF</p>	Where appropriate, this would have fallen into the 'Additional land identified by the Council' category referred to in the Housing Topic Paper.	N	

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								private gardens despite evidence of significant capacity (800 - 1,600 dwellings depending on assumptions – see Appendix). Why Unsound : Plan has not demonstrated that all reasonable alternatives have been tested, contrary to the NPPF requirement for justification.				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 Capacity Study to inform policy.						requirement for justification.		
0282004	Organisation	Kevin	Fraser	Essex County Council	Yes	SP2	No	ECC support the aim to deliver well-designed	No		ECC require Criteria 3b is amended to read: Support the delivery of well-designed neighbourhoods, which enhance the local environment, enable urban greening, to create places where people want to live,		Yes	Not Stated	Yes, ECC supplied 8 additional appendices	B	Recommends the addition of urban greening to be included to deliver well-designed neighbourhoods that enhance the	Accepted: The Council agrees that urban greening provides opportunities for creating attractive neighbourhoods.	3b. Support the delivery of well-designed neighbourhoods, which enhance	

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								d neighborhoods that enhance the local environment and create attractive, liveable places. As part of this, there is a clear opportunity to incorporate urban greening, particularly through the use of tools like Natural England's Urban Greening Factor (UGF) consistent with Policy ENV3 – Securing Nature Recovery and Biodiversity Net			work, and visit now and in the future;				containing various pieces of evidence		local environment Supports the requirement for masterplans prior to submission of a planning application and recommends that they are landscape-led to ensure that GBI, biodiversity and climate resilience are considered at the outset.		the local environment, enable urban greening, to create places where people want to live, work, and visit now and in the future

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								Gain, criteria d.3. ECC support the requirement for a masterplan, approved by CPBC, to be in place prior to the submission of a planning application. Masterplans should encourage a landscape-led approach to design to ensure that GBI, biodiversity, and climate resilience, and the ELNRS are considered from the outset,											

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								shaping development around the natural environment rather than retrofitting it.											
0336-0002	Organisation	Caroline	Peters	Essex Police		SP2	Not Stated	Within Paragraph 3 it is stated that 'new development contribute(s) positively towards the quality of the Borough'. The DOCO notes the need to make effective use of Urban land and agrees development should contribute positively. It is advised	Not Stated		The DOCO notes paragraph 6.27 which advises the Council will work alongside Design Teams to ensure development is appropriately designed. We would strongly advocate that the DOCO is included in this process to ensure new development is being designed with the considerations towards crime and anti-social behaviour (ASB). Furthermore, academia identifies that the impact (and perception of) crime can have a negative effect on the health and wellbeing of communities, which aligns to longer term sustainability goals.					A	advised there is liaison with Essex Police to ensure all new development is designed to be safe and secure which will support this policy and National Guidance.	Applications will have to comply with policy D1 which encourages design out crime	N

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								there is liaison with Essex Police to ensure all new development is designed to be safe and secure which will support this policy and National Guidance.											
0341-0003	Organisation	Jane t	Nuttal	Natural Engalnd		SP2	Yes	Please note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy.	Yes							A	Please note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy.	Modifications agreed <u>Modification to Policy SP2</u> 3d. Support integrated access to public open space, and the enhancement of the multi-functional green infrastructure network and biodiversity to offer a range of health, and environmental benefits; <u>Modification to Reasoned Justification</u>	Y - <u>Modification to Policy SP2</u> 3d. Support integrated access to public open space, and the enhancement of the multi-functional green infrastructure network and biodiversity to offer a range of health, and environme

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																		6.30 As the density of the urban areas increases within the Borough, the need to protect and enhance access and existing environmental assets to make the best use of local open spaces and protect urban biodiversity becomes more acute. By opening up access to a wide range of facilities, residents and visitors will have an increased choice about when and how often they use local green assets.	ntal benefits; <u>Modification to Reasoned Justification</u> 6.30 As the density of the urban areas increases within the Borough, the need to protect and enhance access and existing environmental assets to make the best use of local open spaces and protect urban biodiversity becomes more acute. By opening up access to a wide range of facilities, residents and visitors will have an increased choice about when and how often they use

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																			local green assets.
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
1440-0023	Organisation	Joseph	Beale	RSPB	Yes	SP2	Yes		No	Justified	It is important that brownfield are also identified as sites of potential high biodiversity (as per the Essex LNRS) and that development on such land should feature brownfield features such as mixed aggregates and green roofs and walls. Such development	Brownfield should be identified as potentially being high biodiversity (as per the Essex LNRS). Development on such land should	No				Brownfield should be identified as potentially being high biodiversity (as per the Essex LNRS). Development on such land	Noted	N

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											design can also lead to improved well-being in places of residents and work. Policy SP2 does not indicate that habitats and biodiversity will factor into development design.	feature brownfield features such as mixed aggregates and green roofs and walls. Such development design can also lead to improved well-being in places of residents and work. Policy SP2 should indicate that habitats and biodiversity will factor into development design.					should feature brownfield features such as mixed aggregates and green roofs and walls. Such development design can also lead to improved well-being in places of residents and work. Policy SP2 should indicate that habitats and biodiversity will factor into development design.		
0738-0004	Organisation	Roy	Warren	Sport England	Yes	SP2	Yes		Yes		The policy is supported, especially part 3 because the requirements would support the creation of active environments that would encourage physical activity through the planning and design of development. The policy would be consistent with Sport England's Active Design guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design and Government policy in paragraph 96(c) and 129 of the NPPF.		No	Not Answered		A	Supports SP2 and creation of active environments, accords with Sports England Planning for Sport guidance and paragraph 96(c) of NPPF	Support noted.	N
0001-0001	Individual	John	Butt		Yes	SP3	Not Stated	If further developments on Canvey Island then a third	Not Stated	Not Stated							Objects to housing development in Canvey island. Development on Canvey needs a third access road, promised	Noted. Development must demonstrate infrastructure sufficiency or secure mitigation, as set out in INFA policies.	N

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								road for access on and off the Island required. A third road has been promised since the 1980s for further access to Canvey Island. It's taken you 40 years to finish the sea wall. Now it is 49 years overdue for a Third access road to Canvey Island									since the 1980s and still undelivered.		
0004-0001	Individual	Pauline	Smith		Yes	SP3	Not Stated	I have just read that you are proposing a further 3000 homes on Canvey I would like to	Not Stated	Not Stated			Not Stated		No		Objection to further housing development in Canvey	Noted	N

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								express my strongest opposition to to any further development we are already overloaded the roads are congested at all times of the day ,God help us if there was a Major incident											
00050001	Individual	Ed	King		Yes	SP3	Not Stated	I strongly oppose the plan to build more houses / dwelling on Canvey Island. As a local I am amongst thousands of residents that strongly feel the Island is	Not Stated	Not Stated			Not Stated		No	A	Objection to further housing development in Canvey. Concerns over access to Canvey.	Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex	N

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								already vastly over populated which poses an extremely High Risk to the islander's safety...! As you are aware there is only ONE main route off the island - what needs to be addressed is better Access and Egress for as things stand, we are sitting ducks in the event of an explosive related incident / accident . So										Implementation Plan	

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								this is our priority, NOT more housing which will massively exacerbate our safety and wellbeing. No, No, No to more housing!											
00060001	Individual	Anne	Meecham		Yes	SP3	Not Stated	I have lived on Canvey for [REDACTED] a lovely place back then with a thriving Town centre and also a quaint nice looking place to live....fast forward to now and it has become just a glorified housing	Not Stated	Not Stated			Not Stated		No		Long-term resident objects to overdevelopment on Canvey Island, citing loss of character, access, lack of infrastructure, flood risk, and ignored open space evidence.	Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the	N

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								estate with now numerous flats going up everywhere, the flats aren't a bad thing as we need accommodation for youngsters first step on the property ladder but we are becoming overburdened. So when I read that there is a proposal for 3,000+ more buildings coming (I had to go back and read that again in shock) !! We cannot possibly take any more, as										supporting Infrastructure Delivery Plan (IDP). Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Open Space standards set by Policy Infra3 and supported background evidence (Open Space Assessment 2022)	

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								everyone says before me, there is ONE roundabout to get off here, (since I moved here in 1970s) we have been promised another road off not from the roundabout somewhere else!.From about 1.30pm we are gridlocked coming onto the Island, awhile back we used to have emergency places to go to if there was an emergency on												

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								Canvey, see that has evaporated, well apart from swimming there would be no way off the Island especially if you are disabled !! Everytime we have a downpour there is about a foot of water laying on the road surface.! So more building means even more surface water, the drains just cannot cope but you know this already!! We need open											

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								greenland spaces for mental chill out times, it is so important especially now with so much going on in our lives, we have lost so much already.. . I'm sure if the powers that be could find a way to build on the sea they would!... .Please don't take away our remaining bits of land it is just so unfair to put most of the proposed buildings on to												

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								our Island... What was the point in doing that extensive/expensive survey a few years ago about open spaces and how it affects us if you are going to just ignore that outcome !!											
00080001	Individual	Don	Liddard		Yes	SP3	Not Stated	I am really pleased that some of the green belt sites have been removed, but was surprised that the North West corner area {Blinking Owl} was	Not Stated	Not Stated			Not Stated		No	A	Opposed to development on Green Belt land, but Supports North West Thundersley (Blinking Owl site) for housing.	Noted North-West Thundersley Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy	N

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								left out, this area is perfect location.										SP3 option 4) outlines why North West Thundersley was not preferred.	
0009-0001	Individual	Robert	Sharp		Yes	SP3	Yes	Dear Sir Thank you for your Aug 1 Consultation The citizens of Castle Point are concerned that the thought of introducing further housing without addressing the existing major road congestion would be intolerable. As I am sure you know, unacceptable traffic congestion already occurs every	Yes				Not Stated		No	A	Resident objects to further housing due to severe traffic congestion in Benfleet, Canvey, and Hadleigh, and calls for new access roads before any development proceeds.	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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								morning and evening in Benfleet, Canvey & Hadleigh . This will only get worst with the housing expansion already planned for Southend and Shoebury as the only access is via CastlePoint. Every new house tends to add two cars. Action should be taken as follows: 1) Before any new housing estates are even considered, new access roads												

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								<p>need to be built in Benfleet, Hadleigh & Canvey</p> <p>2) This may be possible from Canvey by a road to link with further up the A13 at Fobbing thus easing Canvey Way/A13 junction. Also possibly a link direct to Leigh for access to Southend.</p> <p>3) More difficult however, is adding new access roads in South Benfleet and Hadleigh. The area is</p>												

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								already congested with housing which proves our concern, we cannot build any more major housing except maybe the odd fill ins. 4) This suggests more housing would be impractical for traffic reasons, in addition to increase in demand for doctors, schools and other essential services. You state that 'delivery of development											

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								accords with the needs of the area', exactly, and more housing is not a demand for the residents in CP. I would appreciate your views when available and I am ready to meet if you need me to attend any meetings.												

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0010001	Individual	Neal	Garner		Yes	SP3	No	“The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Not Stated	To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government’s target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the	I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.	Not Stated		No	A	Welcomes the decision not to allocate Green Belt land. But suggests NW Thundersley should have been considered Argues the Plan fails to demonstrate a deliverable five-year supply. Strongly objects to over-allocation on Canvey Island due to flood risk, drainage limitations, and lack of a third access road. Criticises the exclusion of North West Thundersley (Blinking Owl site), which he sees as a more sustainable and infrastructure-led alternative. Also questions the sites SA assessment. Concerned over evidence of Duty to Cooperate.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.). • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at								mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in									

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential.								

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to											

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding											

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure											

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thunder sley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in											

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								propose housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address											

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								ed before submission for examination. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a											

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								deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower											

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								<p>assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while</p>											

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								the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academi											

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								<p>c concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan T Five-year Housing Supply and Green Belt Protection on Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local</p>											

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								<p>priorities . However , the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to</p>											

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								speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, somethi											

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								ng that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is											

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								essential . I commended the Council for removing several treasured Green Belt sites from consideration for development. However , I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not											

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								include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning											

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								applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councils entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thunderley represents a											

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								carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to											

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								other residential settlements in the Borough. Recommendation to include North West Thunder sley in the plan as a strategic housing growth site The exclusion of North West Thunder sley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth											

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								in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribu											

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								te meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thamesley offers a strategic											

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								growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are											

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								sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thunder site is not viable due to policy restrictions by the local highway authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Intercha											

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								<p>ange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastru</p>											

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								<p>cture planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in</p>											

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								principle . On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF,											

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								Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thunder sley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must											

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								be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are											

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								demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thunderley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and											

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								inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include											

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								North West Thunder sley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public											

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								interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I											

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								believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening											

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								the brownfield strategy and including North West Thunder sley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thunder sley offers a strategic opportunity for sustainable growth. As a Resident of Castle Point, I find the format											

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								of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's											

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								Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan											

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								can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. “											

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001-0001	Individual	James	Robbins		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Not Stated	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally	I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate. The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	Not Stated		No	A	Supports Green Belt protection but argues the Plan fails to justify its housing shortfall or demonstrate a deliverable five-year supply. <ul style="list-style-type: none"> • Duty to Cooperate is a particular shortcoming - absence of clear and binding agreements. • Strongly objects to over-allocation on Canvey Island due to flood risk, drainage limitations, and lack of a third access road. Suggests that standard SuDS solutions will not work on Canvey. • Criticises the exclusion of North West Thundersley (Blinking Owl site), which he sees as a more sustainable and infrastructure-led alternative. SA fails to consider it properly. Calls for Plan modification to include North West Thundersley and 	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. <ul style="list-style-type: none"> • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation). • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply. I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at						reduce pressure on flood-prone areas. • 5 years housing supply not demonstrated (Just 53%) with reliance on constrained sites casting doubt on delivery. • Approach to biodiversity and environmental protection requires strengthening. f mitigation measures require enforceable delivery mechanisms and clear implementation pathways.	year housing land supply. • North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			estate for housing, with businesses integrated with residential homes. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will											

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings,									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period.									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding											

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								g the draft plan are: <ul style="list-style-type: none"> • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. • The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure 											

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								<p>constraints.</p> <ul style="list-style-type: none"> The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. North West Thunder sley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in 												

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								proposed housing numbers on Canvey Island. • The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the											

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								Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed												

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								before submission for examination. The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thunderley, an option that could deliver sustaina											

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								ble growth in a well-connected location, has not been adequately assessed. While the Sustainability Appraisal acknowledges the option, it is given nowhere near enough consideration and the assessment of it lacks the depth of analysis applied to other alternatives. There is no transparent comparison of its sustainability performance,											

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								nor a clear justification for its exclusion. This omission undermines the credibility of the appraisal and raises legitimate questions about whether all reasonable alternatives have been properly considered. The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes											

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								clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measure											

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								<p>s risk remaining theoretical rather than practical . Perhaps most critically , the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a delivera</p>												

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								ble five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculat											

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								ive development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatme											

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								nt of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four											

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								statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolute											

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								ly no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However , in order to											

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								successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully											

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								secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is												

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								obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable											

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								alternatives be fully explored . It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thunder sley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thunder sley in any meaningful											

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								depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. The NPPF is clear											

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								that development should be directed away from areas at highest risk of Flooding . The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already											

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								complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and											

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								reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditio											

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								ns make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or											

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								connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based											

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								measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thunderley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing											

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								growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth.												

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								It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to											

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								<p>assess North West Thunder sley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thunder sley. Canvey Island's geography and infrastructure present significant</p>												

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								planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if											

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								not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island											

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								and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North											

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								West Thunder sley offers a more suitable alternati ve, with better connecti vity, lower flood risk, and infrastru cture- led potential . Five- year Housing Supply and Green Belt Protecti on Castle Point Borough Council deserves credit for adopting a brownfie ld-first approac h. This aligns with national policy and reflects local priorities												

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								<p>However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculat</p>												

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								ive development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that											

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								the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential											

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								. I commended the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include											

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								a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applicati											

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								ons on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councilors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thunder sley represents a carefully											

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								considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other											

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								residential settlements in the Borough. Recommendation to include North West Thunder sley in the plan as a strategic housing growth site The exclusion of North West Thunder sley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location											

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								that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaning											

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								fully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thunder sley offers a strategic growth location											

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								with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable,											

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								resilient and capable of supporting necessary infrastructure. Claims that the North West Thunder sley site is not viable due to policy restrictions by the local highway s authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade,											

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								in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning											

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								documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the											

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								contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County											

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								Council would be legally obliged to engage with Castle Point Borough Council if North West Thunder sley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be address											

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								ed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In											

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								this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thunderley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible											

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								land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West											

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								Thunder sley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and											

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								one that should be embraced, not dismissed.											

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00120001	Individual	Eileen	Read		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Not Stated	In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Welcomes decision not to include Green Belt sites but warns it's meaningless without a deliverable housing supply. <ul style="list-style-type: none"> Strongly objects to over-allocation of housing on Canvey Island due to flood risk, infrastructure strain, and unsuitable drainage systems. Supports inclusion of North West Thundersley (Blinking Owl site) as a strategic growth location with better connectivity and lower environmental risk. Criticises lack of robust evidence for reduced housing target and failure to demonstrate a five-year housing land supply. Argues the Plan is unsound and not legally compliant due to weak Duty to Cooperate, poor 	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground <ul style="list-style-type: none"> Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation). Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. Housing Supply: See housing topic paper. Plan to provide for rolling 5 	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal	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.					Sustainability Appraisal, and inadequate biodiversity safeguards.	year housing land supply.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate										

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a										

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to										

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green										

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and									

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								g the draft plan are: Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip									

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								constraints. The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in propose			roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24-28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal									

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								d housing numbers on Canvey Island. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning			objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of									

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								and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before				Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate."									

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								submission for examination. The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan											

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								identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under											

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								paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply											

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								not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure.											

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00130001	Individual	Kelly	McKenzie		Yes	SP3	No	Good afternoon, I'm disappointed that the consultation process is far too complicated for me to effectively express my views and I can't imagine I'm the only one finding it challenging! Therefore I have set out my response to your plan below: The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and inadequate infrastructure. • Supports inclusion of North West Thundersley (Blinking Owl site) as a more sustainable and accessible strategic growth location. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, particularly regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					include North West Thundersley.	mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or			directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically										

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								Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and										

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								as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main respons			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a										

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								e, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding,			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,												

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								supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								(NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstr											

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								rated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own											

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								lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summar											

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								y, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not											

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								academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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00140001	Individual	Frances	Scarff		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and inadequate infrastructure. <ul style="list-style-type: none"> • Supports inclusion of North West Thundersley (Blinking Owl site) as a more sustainable and accessible strategic growth location. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, particularly regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and 	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground <ul style="list-style-type: none"> • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes 	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					include North West Thundersley.	mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion										

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and										

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a										

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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00150001	Individual	Sam	McKenzie		Yes	SP3	No	Good afternoon, I'm disappointed that the consultation process is far too complicated for me to effectively express my views and I can't imagine I'm the only one finding it challenging! Therefore I have set out my response to your plan below: The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> • Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	<p>mitigation and delivery mechanisms.</p> <ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or			directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically										

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								Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and										

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								as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main respons			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								e, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding,			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,												

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								supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								(NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstr											

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								rated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own											

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								lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summar											

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								y, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not											

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								academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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00160001	Individual	Cheryl	Redwin		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> • Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	<p>mitigation and delivery mechanisms.</p> <ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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00170001	Individual	Christopher	Knight		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> • Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	<p>mitigation and delivery mechanisms.</p> <ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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00180001	Individual	Michael	Solkhson		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion										

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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00190001	Individual	Andrew	Gosnold		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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0021-0001	Individual	Samantha	Watts		Not Stated	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No		Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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002-0001	Individual	Carl	Wright		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> • Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	<p>mitigation and delivery mechanisms.</p> <ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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0020001	Individual	Gina	Keeble		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					modifications to reduce pressure on Canvey and include North West Thundersley.	mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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00240001	Individual	Kerri	Thipthorpe		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> • Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	<p>mitigation and delivery mechanisms.</p> <ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion										

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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0025-0001	Individual	Anita	Houser		Yes	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey [Redacted Personal Information] but it is quite obvious that is unable to sustain any additional building with the current	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								infrastructure. Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> • Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	<p>mitigation and delivery mechanisms.</p> <ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are			directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically										

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								especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include				discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been construc			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a										

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								tive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth.			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								* The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thunder			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								sley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone												

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								into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required											

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								under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidence											

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								<p>d supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my</p>												

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								view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure											

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								development is sustainable, justified, and in the public interest.											

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00260001	Individual	Reece	Marshall		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> • Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	<p>mitigation and delivery mechanisms.</p> <ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion										

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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0027-0001	Individual	Rebecca	Harris		Yes	SP3	No	As the Member of Parliament for Castle Point, I have always stood firmly alongside local residents in defending the character, integrity, and resilience of our Borough. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and	No	Positive, Effective, Justified, Consistent	Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work	In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19	Not Stated		No		<p>Objections on:</p> <ul style="list-style-type: none"> • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. 	<ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	N

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								aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are			undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible	process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. I also encourage the Council to										

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								especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known, and in parts of Benfleet and Hadleigh, where drainage infrastructure is under strain. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards			evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage	release a more accessible version of the consultation. Many residents have found the Regulation 19 process difficult to engage with due to its length and complexity. A more user-friendly approach would help ensure that all voices are heard. I urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate. With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough.										

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								Southern d, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation,			network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the									

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								many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, for reasons I will detail later in this response, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a			same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North									

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								case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic			West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the 'Canvey Third Access Task Force' in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves										

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								solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access			credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless,										

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								for the Borough onto the wider road network. I would also like it to be acknowledged that, although the Council's approach to engagement has been broadly constructive and the consultations on the Plan well-advertised, many residents have found the Regulation 19 consultation difficult to engage with due to its length and			providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site. The exclusion of North West Thundersley from										

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								complexity. It is vital that, where possible, this is made more accessible for residents, so that all voices in our community can be heard and understood. Hence why, although I have attempted to answer all the questions in the consultation, I would like this document treated as my main response, as it is far easier for me to outline			the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable										

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								the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure			due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglens Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24-28 of the NPPF, Essex County Council would be legally obliged to engage with Castle									

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								to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a			Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. For several decades now residents across Castle Point have fought tirelessly to protect our Green Belt from									

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								sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of			inappropriate development. Time and again local people have stood together to defend fields, woodlands and open spaces that give our Borough its unique character and identity. These battles have often been long and difficult, but our communities have prevailed because the case for preservation has always been strong. The Government's so-called "Grey Belt" is intended to capture parcels of Green Belt land that are derelict, fragmented, or of genuinely low environmental and amenity value. It was never meant to include land that is open, valued by communities, or performing the very purposes that the Green Belt is meant to serve. There is no doubt that if the Council's draft plan is found unsound, which I believe because of the reasons outlined in my previous submission there is a very serious risk that it will be, the Inspector will direct the Council to look at what they have identified as 'Grey Belt' sites for development to attempt to better meet local housing targets. I fear that by classifying large areas of Castle Point as "Grey Belt" the Council are inviting the Planning Inspector to do the very thing residents have fought against for decades, release treasured Green Belt for development by mislabelling it as expendable. For that reason I set out below a site-by-site rebuttal to the											

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								the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparin				Council's classifications, explaining clearly why these parcels should not be treated as Grey Belt and why each continues to merit Green Belt protection. West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness ¹ . West of Canvey Road is essential to the integrity of Canvey Island's landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against climate challenges. Reclassifying such a strategically important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF's requirement to safeguard land from encroachment ² . East of Canvey Road (GB2) The Council's justification for classing it as 'Grey Belt' land seems to be is that it is adjacent to existing built area was and previously considered for development, therefore seen as lower value ¹ . This parcel is wrongly characterised. East of Canvey Road provides separation between industrial uses and residential												

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								g the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination.			<p>communities. Its open nature prevents ribbon development along this strategic road and offers necessary land for drainage and flood resilience. Canvey is already over-allocated with housing in this draft plan, to designate such land as Grey Belt ignores the island's unique vulnerability and the strong evidence from Essex County Council's Section 19 Flood Report³. Land South of Charfleets (GB3)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be the proximity to Charfleets industrial estate and perception of reduced "connectivity"¹.</p> <p>Land South of Charfleets forms a vital open break preventing sprawl from overwhelming this industrial area. Its greenery offsets industrial activity, provides amenity value and performs drainage functions. To downgrade it because of industrial adjacency is to misunderstand Green Belt policy, the NPPF explicitly highlights safeguarding the countryside from encroachment as a key purpose².</p> <p>Land off Glebelands (GB4)</p>									

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											<p>The Council's justification for classing it as 'Grey Belt' land seems to be that this is one of the small peripheral parcels of Green Belt land that make less of a contribution to strategic openness¹.</p> <p>Glebelands is a green wedge that separates built form and protects the rural character of its surroundings. It is valued by residents for informal recreation and ecological richness. Parcel size is irrelevant, the NPPF sets no minimum thresholds and many small Green Belt sites perform critical local functions. To mark this as Grey Belt is to apply arbitrary tests not supported by national policy. I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning appeal stage. I am disappointed that those victories could be rendered meaningless by now designating it 'Grey Belt'.</p> <p>West of Benfleet (Jotmans) (GB5)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be based on somewhat fragmented ownership of the whole site (although large parts are in single ownership) and adjacency to existing</p>									

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											<p>residential development¹.</p> <p>The Jotmans fields are one of the most important open landscapes in Castle Point. They prevent coalescence between Benfleet and surrounding areas, retain visual openness and support biodiversity corridors. Fragmented ownership does not diminish value, indeed it may reduce development pressure. Residents have repeatedly resisted speculative schemes here, demonstrating it's continued community importance. Just as with Glebelands, I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning appeal stage and then the High Court. I am disappointed that those victories could be rendered meaningless by now designating it 'Grey Belt'.</p> <p>Land between Felstead Road and Catherine Road (GB6)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that its irregular shape and limited access diminish its strategic contribution¹.</p> <p>Shape and access are not tests of Green Belt worth. This parcel prevents outward sprawl from nearby roads and</p>										

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

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

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											<p>East of Manor Trading Estate (NR3)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that the adjacent trading estate diminishes openness¹.</p> <p>This parcel is a buffer between employment and housing, mitigating noise and pollution. It safeguards residents' quality of life while preventing encroachment. Its role as a barrier to industrial creep is precisely the kind of function the Green Belt is meant to serve.</p> <p>Land North of Thundersley Church Road & East of Downer Road North (GB19)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of the current settlement and land promoted through the call for sites¹.</p> <p>This land forms a distinct wedge of open countryside that prevents coalescence, supports biodiversity and protects Thundersley's semi-rural setting. Its importance is recognised by residents who have fought repeated attempts to develop it.</p>										

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											<p>Land to the rear of 329 Benfleet Road (GB23)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a small parcel promoted in call for sites¹.</p> <p>Small parcels often have high value. This one prevents ribbon development and protects neighbour amenity. It should not be downgraded merely for its size.</p> <p>Land off Shipwrights Close (GB24)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a 'gap' site adjacent to housing¹.</p> <p>This parcel prevents settlement creep and maintains green relief for residents. Loss would encourage incremental erosion of the Green Belt.</p> <p>Land between Glen Haven and Ye Oaks, Bassenthwaite Road (GB26)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of a plot promoted for</p>									

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											<p>development¹.</p> <p>This site maintains the clear transition from settlement to countryside. Its openness is important locally. Downgrading it risks creeping coalescence.</p> <p>Land Adjacent 298 Church Road (GB27)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it was identified as a small parcel available for development in call for sites¹.</p> <p>This land contributes to the green setting of Church Road. Small parcels can be disproportionately important to character.</p> <p>Land off Glyders (GB31)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is an edge-of-settlement parcel¹.</p> <p>Glyders prevents sprawl and supports biodiversity. Its downgrade is unjustified. I also believe this was also not a site featured in the regulation 18 consultation as a possible Green Belt</p>										

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											<p>development site. It would be unfair to local residents to consider it 'Grey Belt' out of the blue now.</p> <p>Grandview Stables, Grandview Road (GB34)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that Green Belt used for equestrian purposes can be seen as less open and accessible and therefore make a lower contribution to the functions of Green Belt¹ Grandview Stables is a classic rural land use. It preserves openness and supports recreation. It should not be downgraded. The Council's classification of these parcels as "Grey Belt" is unjustified and dangerous. None of the sites above meet the Government's suggested criteria for such a label, they are not derelict, they are not redundant, and they are not expendable. Each makes a clear and demonstrable contribution to the Green Belt purposes set out in the NPPF. By applying the "Grey Belt" label the Council are not protecting the Green Belt but putting it at risk. Should the Plan be found unsound, these will be the first sites the Inspector turns to. That is why I urge the Council to review their classifications and to give the residents who live</p>													

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											<p>around each site the explicit opportunity to argue against the label before the examiners are invited to reassign their fate. Most importantly, I reiterate that the Borough's housing needs cannot and should not be met by sacrificing these vital sites. A better and more balanced alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough's most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong dishonest to not classify all or if not significantly more of the site as 'Grey Belt' when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents.</p> <p>I urge the Council to further consult with local residents specifically around 'Grey Belt' sites who many not be aware of the significance of the label and the implications of it if the Council's plan is found flawed and unsound by the Inspector.</p>													

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003-0001	Individual	Linda	Sadler		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	<p>Objections on:</p> <ul style="list-style-type: none"> • 5 Year housing supply - Not identified as required under NPPF 78. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. <p>Comments on:</p> <ul style="list-style-type: none"> • Concerns with infrastructure capacity and pressure to accommodate growth, particularly on Canvey. • Canvey: Concerns over flood risk. • Concerns with lack of access to the Borough, and Canvey in particular. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley 	<ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP)). • Access to the Borough, esp. Canvey: The plan 	N

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					should have been included	has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Comments noted.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
00340001	Individual	Norman	Warren		Yes	SP3	Yes	Good afternoon, May I say having read the above, I feel that the council have put together a plan that the people	Yes				Not Stated		No	A	<ul style="list-style-type: none"> Government housing numbers are unrealistic and plucked out of thin air, without any knowledge of the areas involved. The plan is sound. Important to not give in to mounting pressure to 	Support and concerns noted. <ul style="list-style-type: none"> Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk considered in the supporting Strategic Flood Risk Assessment (SFRA). 	N

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								of castle point would say was what they would accept under very difficult circumstances. The government has put so much pressure on councils with very unrealistic numbers of homes, with numbers just being plucked out of thin air, without any knowledge of the areas involved, Unfortunately they seem to be on a mission to upset									avoid the start of a slippery slope. • Concerns with infrastructure, flood risk, wildlife, heritage and the threat of urban sprawl.	<ul style="list-style-type: none"> • Wildlife addressed in Policies (particularly ENV1-6) supported by a range of supporting evidence including the Habitats Regulations Assessment, Local Wildlife Site Review, South Essex Green and Blue Infrastructure Study, Essex Local Nature Recovery Strategy, Living Landscape reports, Biodiversity Report, Strategic Biodiversity Assessment. • Heritage protected by Policy D9 Conserving and Enhancing the Historic Environment 	

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								many people at the moment with many policies, The plan is sound, and I thank the councillors for listening to the public opinion at meetings leading up to this time, also the planning department for their extreme effort under the most difficult pressure put on them at this time. With all that said, I think that this is a time when the											

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								councils and public have got to be very brave and resilient, and do not give in to mounting pressure that will come without any foundation whatsoever. If we are not strong together, the outcome for the council, councillors, and residents will be the start of a slippery slope that does not end well. Everything has been said regarding the											

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								roads, One accident , gridlock. For every dwelling built, usually two cars, extra service supply for more households, water,se wage etc. Hospitals, Doctors, Schools etc, already under increasing pressure , Also flood risks in the borough, and damage to the environment. The History of Hadleigh , The Greenbelt, The											

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								farmland in around The Castle, and surrounding area, ie the Salvation Army land, is what brings people to our borough to see on their visits, with nature, wildlife, and again the history, bringing extra income to local businesses, Finally I think that turning areas of beauty and history, into urban sprawl is a disaster that can											

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								never be made right, You do not have to go too far or look elsewhere to know exactly what can happen when it is uncontested. We all need to be together and most resilient in this most important issue, which will affect us and our children's life forever, Thankyou, Norman Warren, and if I can add my wife Denise Warren to these commen											

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								ts, which she agrees with.											
00350001	Individual	Denise	Warren		Yes	SP3	Yes	Good afternoon, May I say having read the above, I feel that the council have put together a plan that the people of castle point would say was what they would accept under very difficult circumstances. The government has put so much pressure on councils with very unrealistic	Yes				Not Stated		No		<ul style="list-style-type: none"> Government housing numbers are unrealistic and plucked out of thin air, without any knowledge of the areas involved. The plan is sound. Important to not give in to mounting pressure to avoid the start of a slippery slope. Concerns with infrastructure, flood risk, wildlife, heritage and the threat of urban sprawl. 	Support and concerns noted. <ul style="list-style-type: none"> Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk considered in the supporting Strategic Flood Risk Assessment (SFRA). Wildlife addressed in Policies (particularly ENV1-6) supported by a range of supporting evidence including the Habitats Regulations Assessment, Local Wildlife Site Review, South Essex Green and Blue Infrastructure Study, Essex Local Nature Recovery Strategy, Living Landscape reports, Biodiversity Report, Strategic Biodiversity Assessment. 	N

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								ic numbers of homes, with numbers just being plucked out of thin air, without any knowledge of the areas involved, Unfortunately they seem to be on a mission to upset many people at the moment with many policies, The plan is sound, and I thank the councillors for listening to the public opinion at meetings leading up to this										• Heritage protected by Policy D9 Conserving and Enhancing the Historic Environment	

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								time, also the planning department for their extreme effort under the most difficult pressure put on them at this time. With all that said, I think that this is a time when the councils and public have got to be very brave and resilient, and do not give in to mounting pressure that will come without any foundation whatsoever. If we											

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								are not strong together, the outcome for the council, councillors, and residents will be the start of a slippery slope that does not end well. Everything has been said regarding the roads, One accident , gridlock. For every dwelling built, usually two cars, extra service supply for more households, water, sewage etc. Hospitals, Doctors,											

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								Schools etc, already under increasing pressure , Also flood risks in the borough, and damage to the environment. The History of Hadleigh , The Greenbelt, The farmland in around The Castle, and surrounding area, ie the Salvation Army land, is what brings people to our borough to see on their visits, with nature, wildlife,											

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								and again the history, bringing extra income to local businesses, Finally I think that turning areas of beauty and history, into urban sprawl is a disaster that can never be made right, You do not have to go too far or look elsewhere to know exactly what can happen when it is uncontested. We all need to be together and most											

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								resilient in this most important issue, which will affect us and our children's life forever, Thankyou, Norman Warren, and if I can add my wife Denise Warren to these comments, which she agrees with.											
0038-0001	Individual	Janice	Cramer		Yes	SP3	No	Dear Sir or Madam, I am emailing to protest against the Castle Point plan. I am a Canvey Island resident and it is ludicrous that	No	Not Stated			Not Stated		No	A	Disproportionate growth directed to Canvey. Canvey Island is not suitable for development. <ul style="list-style-type: none"> • Canvey Island is a flood plain, built with dykes and soakaways. The ground is mainly clay, it is well known for surface water flooding and is a tidal flood risk. • Current drainage 	Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue

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								you propose to build over 3,300 homes here. It is extremely excessive compared to Benfleet, Hadleigh and Thundersley! I understand we have to build more affordable homes in CP borough, but make it fair across the borough, not mainly all on Canvey. There are many reasons why Canvey Island is not suitable									systems are inadequate, our own home was flooded in the 2014 storm where drains could not cope, hundreds of homes were damaged which took months to dry out and be repaired. There has been no upgrade to drainage since, so this could easily happen again, especially with climate change and adverse weather conditions. <ul style="list-style-type: none"> • There are only two roads on and off of Canvey Island, the traffic is horrendous especially weekends and rush hour. If there is an accident, breakdown or roadworks, the whole island comes to a standstill (which is a regular occurrence unfortunately.) • We have hazardous Industries on Canvey, mainly the gas 	respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								for development. * Canvey Island is a flood plain, built with dykes and soakaways. The ground is mainly clay, it is well known for surface water flooding and is a tidal flood risk. * Current drainage systems are inadequate, our own home was flooded in the 2014 storm where drains could not cope, hundreds of									terminals, if ever, God forbid there was an emergency, how would the public evacuate and how would emergency services get on the island! • Current infrastructure could not cope with 3,300 more homes - Gp's, dentists, schools, social care, transport etc. etc. There are more suitable sites that could be investigated, such as North West Thundersley or 'Blinking Owl Site'. I hope you listen to all our objections and reconsider this plan.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Emergency Planning: Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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								homes were damaged which took months to dry out and be repaired. There has been no upgrade to drainage since, so this could easily happen again, especially with climate change and adverse weather conditions. * There are only two roads on and off of Canvey Island, the traffic is horrendous especially weekends and											

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								<p>rush hour. If there is an accident, breakdown or roadworks, the whole island comes to a standstill (which is a regular occurrence unfortunately.) * We have hazardous Industries on Canvey, mainly the gas terminals, if ever, God forbid there was an emergency, how would the public evacuate and how would emergency</p>											

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								services get on the island! * Current infrastructure could not cope with 3,300 more homes - Gp's, dentists, schools, social care, transport etc. etc. Yes, Castle Point do need to build more homes, and I believe with many, many others, that there are more suitable sites that could be investigated, such as North West Thunder												

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								sley or 'Blinking Owl Site'. I hope you listen to all our objections and reconsider this plan.											
0041001	Individual	Carolyn	Blake		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic

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								are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface			strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is	homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.					constraints. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of	evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water Modelling Technical Note of the SFRA.	Flood Risk Assessment (SFRA).

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								water flooding are well known. Also, significantly there are effectively only three highway access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local			superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst.						Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and		

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								residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However			These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure							Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-			limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic									

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								needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites			weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly										

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								resident's treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulator			viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning										

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								on 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the			applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on									

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								formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is			Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to										

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								excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should			accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24-28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt									

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								be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally complia			designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to										

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								nt, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where,			engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a											

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								fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle											

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								Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised											

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								to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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00420001	Individual	David	Blake		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.				considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey	Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water Modelling Technical Note of the SFRA.		

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically						because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit		

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion						for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and										

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a										

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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00430001	Individual	Kiera	Blake		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No		Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ' A Better	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey	Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water Modelling Technical Note of the SFRA.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically						because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit		

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion							for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
00440001	Individual	Sandra	Weight		Not Stated	SP3	Not Stated	I found your website on the Castle Point pre submission local plan completely un navigable. I sincerely hope	Not Stated	Not Stated			Not Stated		No		Object to new homes not going to local people. Concerned about impacts upon highways congestion, infrastructure, heritage (Hadleigh Castle) and foreshore	Noted. Housing needs informed by the Housing Needs Assessment, which includes an assessment of local 'concealed' families and suppressed household formation, as well as migration trends. The plan has been	N

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								that this isn't to deter people, like myself, from objecting to our local green environment and communities being destroyed by housing and the infrastructure needed to support such a project. I object most strongly to the fact that these proposed homes will not even go to local people! The chaos that such a project would cause to										subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). The Council published a Hadleigh Farm estate Heritage Impact assessment in June 2025. Much of the District's foreshore areas are protected either as international sites or as SSSI. Impacts of development are considered in the Habitat Regulations Process (HRA).	

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								<p>one of the two main arteries to and from our coast would be catastrophic for Southend, Leigh, Hadleigh, Canvey and Rayleigh.</p> <p>The amount of traffic the extra houses and people generate would devastate our crumbling roads and walkways. Our overcrowded, hospitals, doctors and schools would be a nightmare for all who live here. Our</p>											

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								wonderful heritage site, Hadleigh Castle, and our foreshore would be under severe threat. As a local resident I urge you not to go forward with this awful plan. People do not want it! Our area is so much more than a government target. I trust that you will consider my comments as I believe they are shared with most of us who live here.											

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00470001	Individual	James	Robbins		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey	Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water Modelling Technical Note of the SFRA.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically						because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit		

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion							for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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0051-0001	Individual	John	Webb		Yes	SP3	No		No	Not stated	<p>I wish to formally object to the proposed housing development on Canvey Island, under the current draft of the Castle Point Borough Council (CPBC) Local Plan. This objection is based on both personaf and local community safety concerns, particularly the failure to properly make and apply provisions of the Civil Contingencies Act Emergency Planning Requirements Flood Risk</p> <p>I write as long-term residents of Canvey Island, being a survivor of the disastrous 1953 flood, I feel entitled to state that if CPBC's Regulation 19 Draft Plan proceeds without site-specific, consequence modelling in terms of flood risk, it risks repeating history under the illusion of modernity. A similar event today given the population growth on Canvey Island will have a much greater catastrophic outcome.</p> <p>Major-Hazardous Installations and Associated Port Facilities REDACTED which increases our vulnerability when faced with emergencies. Our home lies within the consultation distance of COMAH-designated hazardous sites and despite the legal obligatjons under the Control of Major Accident Hazards (COMAH) Regulations arid the Civil Contingencies Act (CCA), we have never received any formal communication regarding emergency planning</p>		Not Stated		No	A	<p>Objects to the proposed housing development on Canvey Island, under the current draft of the Castle Point Borough Council (CPBC) Local Plan. This objection is based on both personaf and local community safety concerns, particularly the failure to properly make and apply provisions of the Civil Contingencies Act Emergency Planning Requirements Flood Risk</p> <p>I write as long-term residents of Canvey Island, being a survivor of the disastrous 1953 flood, I feel entitled to state that if CPBC's Regulation 19 Draft Plan proceeds without site-specific, consequence modelling in terms of flood risk, it risks repeating history under the illusion</p>	<p>Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).</p>	N

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											<p>guidance tailored to our circumstances. We are unaware of evacuation routes, shelter provisions, or how our health needs would be accommodated in the event of a major incident. The failure to warn and inform is not just a procedural oversight-it is a breach of our fundamental rights under the Human Rights Act 1998, particularly Article 2 (Right to Life) and Article 8 (Right to Private and Family Life).</p> <p>Hazard Range Consequence. We are acutely aware that emergency planning fails to provide for the known consequence identified via the Safety Reports of the Oikos and Calor Gas Installations. The ramification of which are not remotely accounted for in terms of human harm, how badly and how many are living and working within the Hazard Range.</p> <p>Vulnerable Communities We are deeply concerned that: Specific emergency plans are generally not known amongst the community. Many of which reside in Park Home retirement dwellings, being completely inappropriate for situations of serious flooding or industrial accidents. Failure to provide public information under COMAH Regulation or the CCA's duty to warn and inform is of huge concern. The vulnerabilities of a young and aging community have</p>						of modernity. A similar event today given the population growth on Canvey Island will have a much greater catastrophic outcome.		

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											<p>been ignored in all local resilience planning, despite clear statutory duty obligations.</p> <p>Conclusion</p> <p>Whilst the Castle Point Plan 2026-2043 does acknowledge flood risk and the presence of major industrial hazards- especially on Canvey Island-it arguably falls short of fully articulating how increased population density could amplify the consequences of such risks.</p> <p>We urge the Planning Inspector to consider whether this plan is truly "sound" or "legally compliant" when it fails to integrate consequence-based emergency planning compounded by access and egress issues. The plan omits viable alternative sites outside of Flood Zone 3 and COMAH Site Hazard Range whilst actively selecting its primary housing site in the already urbanised at risk environment of Canvey Island.</p>													
00540001	Individual	J	Curtis		Not Stated	SP3	Not Stated	To whom this may concern, I have always been concerned regarding the proposed building of houses on	Not Stated	Not stated			Not Stated		No		Concerned by proposed building of houses on Jotman farm, concerns regarding the infrastructure and the traffic	Noted. Infrastructure matters addressed by INFRA policies, Highways and access matters addressed by Promoting Sustainable Transport.	N					

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								Jotman farm, And have attended meetings at the town hall Castlepoint and attended demonstrations and written emails . i still feel the same concerns regarding the infrastructure the traffic road preparations we have more than enough traffic comes through our roads as it is i wish to vote against the proposal of houses											

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								being built.											
00560001	Individual	Linda	Norton		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield	Not Stated		No		A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites, protecting a cherished part of our landscape and heritage. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. Lack of access in and out of the Borough, only three routes. Duty to Cooperate - Absence of clear	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. North West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. Hazardous Industries: Policy SD8 covers Development near	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three			lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability.	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.				and binding agreements on cross-boundary infrastructure and housing distribution. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to more in depth SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new	Hazardous Uses. Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds. Canvey SuDs covered in policy and SFRA but furthermod proposed. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex		

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								highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a				Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under						developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to	Implementation Plan	

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								testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection			high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and							the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and		

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								n by the Council meaning less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the			industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to						recreational value. Its protection is essential.		

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								wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density			the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's									

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								on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complex			residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley									

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								ity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this			represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure									

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								response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries			constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion										

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								s and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a consider			remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth										

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								able decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country			can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidenced, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach											

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								Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and			totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a											

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								deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to											

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								speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate											

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								te, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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0060001	Individual	Neil	Scarff		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	<p>Objections on:</p> <ul style="list-style-type: none"> • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. 	<ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting 	<p>Y - Policy SD3(3)</p> <p>3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).</p>

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> North West Thundersley should have been included. 	evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. Comments noted.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion										

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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0061001	Individual	Colin	Duff		Not Stated	SP3	No	Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	<p>Objections on:</p> <ul style="list-style-type: none"> • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. 	<ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting 	<p>Y - Policy SD3(3)</p> <p>3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).</p>

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								on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> North West Thundersley should have been included. 	evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. Comments noted.	

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								Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They			directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically										

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								must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The propose			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								d allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no													

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								sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparin				site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,												

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								g the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								h 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only											

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								weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft											

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								plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is											

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								sustainable, justified, and in the public interest.											

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00620001	Individual	Matthew	Watson		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					should have been included.	evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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0060001	Individual	Roslyn	Watson		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No	A	<p>Objections on:</p> <ul style="list-style-type: none"> • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. 	<ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting 	<p>Y - Policy SD3(3)</p> <p>3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).</p>

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					<ul style="list-style-type: none"> North West Thundersley should have been included. 	<p>evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA.</p> <p>Comments noted.</p> <ul style="list-style-type: none"> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. 	

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and										

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								g the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990,			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be address			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								ed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year											

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								supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative develop											

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								ment, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of											

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								strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
00670001	Individual	Mureen	Pearce		Not Stated	SP3	No	I agree with Dame Rebecca Harris's reply to you I consider the Castlepoint Plan regulation 19 Draft to be	No	Consistent with National Policy	It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines.	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	No		Yes, Dama Rebecca Harris' consultation response		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk	N

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								unsound . It fails the tests of soundness for justified and consistent with national policy. . The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage , along with flooding implications. Note, I do not wish to participate at the oral									for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	Assessment (SFRA).	

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								submission.											
00680001	Individual	Maura	Bell		Not Stated	SP3	No	I agree with Dame Rebecca Harris's reply to you I consider the Castlepoint Plan regulation 19 Draft to be unsound . It fails the tests of soundness for justified and consistent with national policy. . The plan needs amending, current plan allows for the over development of Castlepoint especiall	No	Consistent with National Policy	It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines.	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	No		No		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	N

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

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																	Castlepoint especially Canvey where there is a lack of infrastructure, sewerage and drainage along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required we can reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.		
00700001	Individual	Frances	Adams		Not Stated	SP3	No	To whom it may concern, I would like it to be known that as a resident of Canvey for [REDACTED] I strongly object to the proposed Regulation 19 plan involving further	No	Justified, consistent with national policy	e. I consider the plan to be unsound. It fails the tests of soundness for justified and consistency with national policy. It does not meet the housing target for CastlePoint, and the site ignores Greenbelt/Greybelt against NPPF guidelines. The plan needs amending, the current plan allows for the overdevelopment of CastlePoint especially Canvey, there is a lack of infrastructure, sewerage and drainage, along with flooding implications.	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the overdevelopment of our urban sites. in fact , considering the NW Thundersley site will give a housing target of 11000.	No		No		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. There are far too many properties	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts	N

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								development on the Island. I have read Dame Rebecca Harris' email to you regarding the said plan. I agree wholeheartedly with everything she has said in responses									on Canvey Island already. There is not enough access to leave the Island in an emergency. The plan allows for over development of Castlepoint especially Canvey where there is a lack of infrastructure, sewerage and drainage along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required we can reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	
0071-0001	Individual	Dawn	Artley		Not Stated	SP3	No	I consider the Castlepoint Plan regulation 19 Draft to be unsound	No	Justified, consistent with national policy	It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines.	The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along	No		No	A	I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting	N

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												with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.					meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	Strategic Flood Risk Assessment (SFRA). Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	
00720001	Individual	Heleen	Davis		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt /	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. I	Not Stated		No		Failed to consider strategic alternatives like North West Thundersley. No credible five-	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley:	N

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								nt. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.			Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	consent to my full name being published alongside my comments for this consultation.					year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	

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00730001	Individual	Joe	Davis		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	Not Stated		No		Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	N

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																	development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley.		
00740001	Individual	Robert	Sharp		Yes	SP3	Not Stated	The citizens of Castle Point are concerned that the thought of introducing further housing without addressing the existing major road congestion would be intolerable. As I am sure you know, unacceptable traffic congestion	No	Not Stated	Therefore the plan currently fails on Soundless grounds as adequate access via roads to proposed new sites is impossible. Can you arrange for the department who will construct the new roads to advise residence accordingly and include these in your plan. A meaningful plan should include new access roads together with how increase demand to doctors, schools and other essentials needed by a larger population are to be achieved. I recognise the Government's pressure on you to expand [REDACTED Inappropriate Language]	Action should be taken as follows: 1) Before any new housing estates are even considered, new access roads need to be built in Benfleet, Hadleigh & Canvey 2) This may be possible from Canvey by a road to link with further up the A13 at Fobbing thus easing Canvey Way/A13 junction. Also possibly a link direct to Leigh for access to Southend. 3) More difficult however, is adding new access roads in South Benfleet and Hadleigh. The area is already congested with	Not Stated		No	A	The Plan currently fails on Soundless grounds as adequate access via roads to proposed new sites is impossible. 1) Currently Castle Point is already log-jammed with traffic congestion both mornings and evenings and access is intolerable. Problem has grown recently due to two reasons a) Recent increase in number of two car households within the borough and b) Recent new housing estates built in Shoebury & Southend who	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	N

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								already occurs every morning and evening in Benfleet, Canvey & Hadleigh. This will only get worst with the housing expansion already planned for Southend and Shoebury as the only access is via Castle Point. Every new house tends to add two car. You state that 'delivery of development accords with the needs of the area',				housing which proves our concern, we cannot build any more major housing except maybe the odd fill ins. 4) This suggests more housing would be impractical for traffic reasons, in addition to increase in demand for doctors, schools and other essential services. Suggestion, a) new road directly from Canvey to Leigh and b) new road east of Canvey to Fobbing area on A13. Both will ease CP.					have to access Castle Point when traveling by car. 2) Your plan proposes even building more houses in Benfleet and Canvey but does not include any new access roads. This will make the traffic jams even worse. You advise that its not the Council's responsibility to plan new access roads, it for another department. Therefore your current plan is unsustainable as published. 3) New access roads are a must if new houses are to be built. However, constructing new access roads in Benfleet is infeasible unless you tear down some houses to make space - defeating the object of more homes! It is possible to construct new roads off Canvey away from		

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								exactly, and more housing is not a demand for the residents in CP. This plan is better than the previous Council's Plan but there are still a number of issues I wish to raise after attending one of your meetings. 1) Currently Castle Point is already log-jammed with traffic congestion both mornings and evenings and access is intolerable. Problem has									Castle Point. Suggestion, a) new road directly from Canvey to Leigh and b) new road east of Canvey to Fobbing area on A13. Both will ease CP. I recognise the Government's pressure on you to expand but why do we need more housing.		

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								grown recently due to two reasons a) Recent increase in number of two car households within the borough and b) Recent new housing estates built in Shoebury & Southend who have to access Castle Point when traveling by car. 2) Your plan proposes even building more houses in Benfleet and Canvey but does not											

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								include any new access roads. This will make the traffic jams even worse. You advise that its not the Council's responsibility to plan new access roads, it for another department. Therefore your current plan is unsustainable as published. 3) New access roads are a must if new houses are to be built. However , constructing new											

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								access roads in Benfleet is infeasible unless you tear down some houses to make space - defeating the object of more homes! It is possible to construct new roads off Canvey away from Castle Point.											
00790001	Individual	Steve	Wood		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200,	No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build	North-West Thundersley and Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025	N

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								North West Thundersley and it has no credible five-year housing land supply.			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.	with Canvey at 1050. Total housing target of 11,000.					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. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt,	North West Thundersley transport evidence. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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																	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.		
0080001	Individual	Lynne	Cornish		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be	North-West Thundersley and Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. SUDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	N

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																	directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
0081001	Individual	Karen	Attenbury		Yes	SP3	No	I consider the Castle Point Plan Regulation 19	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and	No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection	North-West Thundersley and Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North	N

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								Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			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.	sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. Add North West Thundersley	West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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																	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.		
00820001	Individual	Lorraine	Cuthbertson		Not Stated	SP3	No	I do not believe the plan to be sound nor legally compliant. I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this	No	Justified, Consistent with National policy	While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF.	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the	Not Stated		Yes, ECC Floor Risk Consultation	B - see 0082-0003 to 0005	<p>Objections on:</p> <ul style="list-style-type: none"> • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over 	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are:			This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective,	island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.				flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context.	and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design	Assessment (SFRA).	

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								es, including surface water flooding, infrastructure strain and pressure to accommodate growth. • I understand that we have to have some development on Canvey Island but the proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and			and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot								Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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								infrastructure constraints. • The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. • North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable			meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. The NPPF is clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset									

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								decrease in proposed housing numbers on Canvey Island. Many of the reasons given in the CPBC report, issued last week, as to why NWT is not a suitable site are relevant to Canvey Island which has the added issues of tidal flood risk and drainage issues. <ul style="list-style-type: none"> The plan lacks a demonstrable five-year housing land supply, critically 			the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high										

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								undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024).			groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. I understand the West site of CI was not included in CP's Flood Risk Assessment (May 2025). The Council looked at 35 sites, West Canvey not among them and yet still allocated 2,700 homes for development to West Canvey. The 2015 Multi-Agency Partnership identified that Canvey needed major drainage investment before any significant development could proceed safely. Nearly a decade later, Anglian Water - has invested nothing in upgrading the island's capacity. Anglian Water has been fined this month for not maintaining its systems. So why do we think they are going to make any improvements to ours! It is claimed that Essex County Council, who are responsible for managing flood risk in our area, had 'endorsed CPBC plans to build the proposed 2700 home estate on Canvey Island.' A Freedom of information request was made to confirm this claim and ECC stated they had not been consulted on the West Canvey site. Please see attached which lists which information was requested and ECC's response. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the												

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											<p>exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. Particularly when West Canvey was not included in CP's Flood Risk Assessment in May 2025. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning</p>									

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

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

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											<p>rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site. The exclusion of</p>									

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

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											Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24-28 of the NPPF, Essex County Council would be legally										

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

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

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00820003	Individual	Lorraine	Cuthbertson			SP3	Not Stated		No	Not stated	<p>West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness¹.</p> <p>West of Canvey Road is essential to the integrity of Canvey Island's landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against climate challenges. Reclassifying such a strategically important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF's requirement to safeguard land from encroachment².</p> <p>1 = Housing Capacity Topic Paper (August 2025), pp.39-46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes." (p.41). "Equestrian land considered less open." (p.44).</p> <p>2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and</p>					None	Objects to the assessment and categorisation of West of Canvey Road (GB1). Provides evidence that it isn't Grey Belt.	Noted	N

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											safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances.								
0082004	Individual	Lorraine	Cuthbertson			SP3	Not Stated		No	Not stated	East of Canvey Road (GB3) The Council's justification for classing it as 'Grey Belt' land seems to be is that it is adjacent to existing built area was and previously considered for development, therefore seen as lower value ¹ . This parcel is wrongly characterised. East of Canvey Road provides separation between industrial uses and residential communities. Its open nature prevents ribbon development along this strategic road and offers necessary land for drainage and flood resilience. Canvey is already over-allocated with housing in this draft plan, to designate such land as Grey Belt ignores the island's unique vulnerability and the strong evidence from Essex County Council's Section 19 Flood Report ³ . 1 = Housing Capacity Topic Paper (August 2025), pp.39-46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced					None	Objects to the assessment and categorisation of East of Canvey Road (GB3). Provides evidence that it isn't Grey Belt.	Noted	

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											openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes." (p.41). "Equestrian land considered less open." (p.44). 3 = Section 19 Flood Investigation Report – Castle Point (Essex County Council, 2022) "Surface water flooding across Canvey Island demonstrates the severe limitations of drainage infrastructure." (p.12). "Increased impermeable surfaces will exacerbate flood risk." (p.23)."												
00820005	Individual	Lorraine	Cuthbertson			SP3	No		No	Not stated	Land South of Charfleets (GB3) The Council's justification for classing it as 'Grey Belt' land seems to be the proximity to Charfleets industrial estate and perception of reduced "connectivity" ¹ . Land South of Charfleets forms a vital open break preventing sprawl from overwhelming this industrial area. Its greenery offsets industrial activity, provides amenity value and performs drainage functions. To downgrade it because of industrial adjacency is to misunderstand Green Belt policy, the NPPF explicitly highlights safeguarding the countryside from encroachment as a key purpose ² . A better and more balanced alternative, infrastructure-led growth at the appropriate					None	Objects to the assessment and categorisation of Land South of Charfleets (GB3). Provides evidence that it isn't Grey Belt.	Noted	N				

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											<p>location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough's most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong and dishonest to not classify all or if not significantly more of the site as 'Grey Belt' when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents.</p> <p>1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. “Land adjacent to settlement edge with reduced openness...” (p.40). “Fragmented ownership reduces contribution to Green Belt purposes.” (p.41). “Equestrian land considered less open.” (p.44).</p> <p>2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances.</p>												

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00830001	Individual	Christine	Eagleson		Not Stated	SP3	Not Stated	Not Stated	No	Justified, Consistent with National policy	I consider the Castlepoint Plan Regulation 19 draft to be unsound. It fails the test of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castlepoint and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint, especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Flooding, is of a concern due to be victims of surface water and sewage in 2014, [REDACTED] Also no mention of extra access on and off the Island.		No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castlepoint and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint, especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Flooding, is of a concern due to be victims of surface water and sewage in 2014, [REDACTED] Also no mention of extra access on and off the Island.	Objects that housing target not met, while also saying the current plan allows for the over development of Castlepoint, especially Canvey Island. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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00840001	Individual	Debbie	Veal		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of 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 following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Other comments noted	N
00870001	Individual	Christina	Watson		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstan

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								ves like North West Thundersley. No credible five-year housing land supply.			site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban	Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	ces, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
008-0001	Individual	Roy	Watson		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for

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											urban homes for Canvey is not resident led.						strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with	processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	Canvey at 1050. Total housing target of 11,000.		
00890001	Individual	Alan	Dawes		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five year housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											<p>mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. Note, I do not wish to participate at the oral examination. I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. Please acknowledge receipt of my submission.</p>						<p>sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.</p>	<p>must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	

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0090001	Individual	Sue	Greenway		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	considered through the SFRA.	
0091-0001	Individual	Corrine	Greenway		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply.	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

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								consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for	7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.					It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for	transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
00920001	Individual	Dave	Bailey		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and

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

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																	Total housing target of 11,000.		
00930001	Individual	Marilyn	Smith		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No		I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy' The site selection is solely based on the 'over development of Brownfield sites'. The plan has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The NPPF guidelines state development should be directed away from areas at highest risk of flooding. SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	<p>sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.</p>	<p>must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	

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0094001	Individual	James	Robbins		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Justified, Consistent with National policy	I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: <ul style="list-style-type: none"> • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. • The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. • The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. • North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. • 	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	Not Stated		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically						should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	considered through the SFRA.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target								

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaning			without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found										

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								less. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the			sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. The NPPF is clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems									

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								Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island,			such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic										

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								and creating an extra highway access for the Borough onto the wider road network. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The										

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

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											<p>within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am</p>													

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

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

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

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

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											<p>sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as</p>													

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											to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate. I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is 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													

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											<p>flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with</p>											

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00950001	Individual	Donna	Bateman		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape

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								strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			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.	Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
00960001	Individual	Cliff	Cornish		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for the Castle

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

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																	Total housing target of 11,000.		
00970001	Individual	Dawn	Rumsley		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to NOT BE LEGALLY COMPLIANT, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with the national policy. It is not consistent with the National Policy, it does not meet the housing target for Castle Point and the sites selection ignores Greenbelt and Grey Belt against new NPPF guidelines. I consider it not to be justified as the site selection strategy is biased and pre-determined towards a "no Greenbelt build policy", it is solely based on the over development of "brownfield sites", it has not considered all sites, with no greenbelt/grey belt sites added and with the exclusion of the North West Thundersley site the NPPF guidelines state that developments should be directed away from areas at the highest risk of flooding, SUDs measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes put residents in the East at risk with any emergency evacuation procedures. I consider it not to be legally	I believe the following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound 1. Add North West Thundersley site, 187 Ha, as Greenbelt, Grey Belt, Brownfield site option for 7500 homes. 2. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 3. Remove Charfleet's Industrial Estate site from the plan Total Housing target of 11,000	No			B - see 0097-0003	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											prepared and sound due to the two hazardous installations located at the south of Canvey Island which are regulated by the HSE in accordance with the Control of Major Accident Hazards Regulations and would pose additional risk to any potential occupants of any new developments. I believe that has been poor engagement and officers have not engaged with the HSE on proposed developments which fall within the consultation zones of hazardous installations.						sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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00980001	Individual	Lee	McGonagle		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	considered through the SFRA.	
0099-0001	Individual	Susan	Saac		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply.	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

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								consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for	Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.					It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for	transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
0100001	Individual	Terry	Morris		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and	

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

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																	Total housing target of 11,000.		
01000001	Individual	Tina	Gregory		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led,.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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01020001	Individual	Neil	Gregory		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led,.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	considered through the SFRA.	
01030001	Individual	Mary	Stevens		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply.	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			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,.	Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for	transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
01040001	Individual	Alan	Spiller		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and	

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

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																	Total housing target of 11,000.		
01050001	Individual	Sonia	Dowsett		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small,	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.							sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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01060001	Individual	Bernadette	Purcell		Yes	SP3	No	Dear Sir/Madam I do NOT support the Castle Point Plan Regulation 19 Draft Consultation. I consider the Castle Point Plan Regulation 19 Draft to NOT be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			I consider the Castle Point Plan Regulation 19 Draft to be UNSOUND. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. 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 following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes, reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, and a total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	considered through the SFRA.	
01070001	Individual	Tracy	Empson		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply.	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for	7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.				It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for	transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar	landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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											Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Charfleets: Objects to inclusion of residential and lack of engagement,	employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	
0108-0001	Individual	Carol	Fisher		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. Policy reference/name: SP3 / C4 Page number: 25-26 / 40-41	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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								Paragraph number: 6.32-6.35 / 8.33-8.40 I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thunderley and it has no credible five-year housing land supply.			directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for	plan. Total housing target of 11,000. It also does not take into account the additional traffic to be added to the already extremely congested daily traffic problems. Also doesn't consider the local infrastructure and the need of extra dentists, doctors surgeries and schools which will be required. A third road off the Island is a necessity before any such plans should be considered.					Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation	policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Charfleets: Objects to inclusion of residential and lack of engagement,		
01090001	Individual	Tim	McGinley		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic

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

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0113-0001	Individual	D	Darlington		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at	North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	considered through the SFRA.	
0114-0001	Individual	Susan	Ross		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason:	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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								It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Canvey SuDS options have been considered through the SFRA.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0115-0001	Individual	Laura	Webb		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	B - see 0115-0003	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure

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								compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	re network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0115-0003	Individual	Laura	Webb		Yes	SP3	Not Stated		Not Stated	Not Stated	I completely object to any further building in any area of castle point!! And if you guys can't see his ridiculous this is you shouldn't be doing this job! Add in the " we've made an error" is absolutely laughable!!! I COMPLETELY OBJECT TO ANY BUILDING IN THE AREA!!!!!!		Not Stated		No	None	Completely objects to further building in Castle Point	Noted	N
0116-0000	Individual	Olive	Smith		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site	PROPOSED MODIFICATION: Add North West Thundersley site.	No		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA	Y - Policy SD3(3) 3. Proposals must demonstrat

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01								Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	How the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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0117-0001	Individual	Sarah	Bentley		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	emergency evacuation procedures.		
0118-0001	Individual	Rachel	Newcombe		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0119-0001	Individual	Carol	Welfare		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0120001	Individual	Barbara	Harrison		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								land supply.									geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
01210001	Individual	Susannah	Miles		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic

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								credible five-year housing land supply.									not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Flood Risk Assessment (SFRA).
0120001	Individual	Kathy	Phipps		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and

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								Thundersley. It has no credible five-year housing land supply.			3,316+ urban homes for Canvey is not resident led.						Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		the Castle Point Strategic Flood Risk Assessment (SFRA).
01230001	Individual	Victoria	Smith		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternati	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS

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								ves like North West Thundersley. It has no credible five-year housing land supply.			appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01240001	Individual	Adrian	Davis		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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								consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	options have been considered through the SFRA.	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01250001	Individual	Daniel	Smart		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally complia	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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								nt. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01260001	Individual	Ryan	Morris		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the

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								be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						"over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0127-0001	Individual	Jack	Deal		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site	Green Belt/Grey belt covered under policy GB2.All reasonable sites considered in both the supporting SLAA and SA processes.Flooding : Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).SUDs: Policy SD3 covers	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character

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								consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						selection is based on the "over development of Brownfield sites".NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01280001	Individual	Charlie	Stockler		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consult	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

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

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								on 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0131-000	Individual	Gemma	Cosgrove		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA	Y - Policy SD3(3) 3. Proposals must demonstrat

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01								Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	How the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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01320001	Individual	Daniella	Tubwhittington		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	emergency evacuation procedures.		
0130001	Individual	Daniella	Tubwhittington		Yes	SP3	No	I am writing to formally object to the proposed development of 3,316 houses on Canvey Island. While I understand the pressure for housing across the region, the scale and location of this proposal raises serious concerns regarding flood risk, transport accessibility, and existing infrastru			Without a third road or alternative access route, the proposed development is unsafe and unsustainable, placing future and current residents at unnecessary risk. 3. Infrastructure Constraints Healthcare: Canvey's existing GP surgeries, dental practices, and Southend/Basildon hospitals are already overstretched. There is no evidence of additional provision to meet the huge demand this development would generate. Education: Local schools are near or at capacity. No concrete plans for new schools or expansions have been presented. Utilities and Drainage: The island's drainage and sewage systems are known to be fragile, with regular surface water flooding after heavy rainfall. Adding thousands more households will overload these systems. Emergency Planning: In a flood or evacuation scenario, current infrastructure could not safely support the island's existing population, let alone an expanded one. 4. Scale and Sustainability The scale of 3,316 houses is disproportionate to the size and capacity of Canvey Island. Sustainable development must balance housing needs with environmental, safety, and community impacts. This proposal fails to meet that	I urge the planning authority to reject this proposal or, at minimum, require a full independent review of flood resilience, transport infrastructure (including a third road), and service capacity before any consideration of such a large-scale development.	Not Stated		No	Objects to the proposed development of 3,316 houses on Canvey Island, this proposal raises serious concerns regarding flood risk, transport accessibility, and existing infrastructure capacity. 1. Flood Risk Canvey Island is a low-lying area almost entirely below sea level, relying on flood defences and drainage systems for protection. The Environment Agency classifies Canvey as a high flood-risk zone. Adding 3,316 homes would put thousands more people at risk should sea defences fail or extreme weather events occur. National Planning Policy Framework (NPPF) requires that new	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey SuDs options have been considered through the SFRA. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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								<p>cture capacity . 1. Flood Risk Canvey Island is a low-lying area almost entirely below sea level, relying on flood defences and drainage systems for protection. The Environment Agency classifies Canvey as a high flood-risk zone. Adding 3,316 homes would put thousands more people at risk should sea defences fail or extreme</p>			<p>balance. Conclusion For the reasons above, I strongly object to the proposed development of 3,316 houses on Canvey Island. The combination of severe flood risk, inadequate road access, and insufficient infrastructure makes this an unsafe and unsustainable development that would put both new and existing residents at risk.</p>						<p>developments in flood risk areas demonstrate a robust flood risk assessment and show that risks can be safely managed without increasing danger to existing residents. This proposal does not provide convincing evidence of long-term resilience. Climate change forecasts indicate rising sea levels and more intense rainfall events, which will further increase the risk beyond current predictions.</p> <p>2. Transport and Access (No Third Road) Canvey Island currently has only two access roads (Canvey Way and Somnes Avenue), both of which are heavily congested at peak times. Emergency services access is already</p>	<p>range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan.</p> <p>Infrastructure matters, including schools, are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p>	

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								weather events occur. National Planning Policy Framework (NPPF) requires that new developments in flood risk areas demonstrate a robust flood risk assessment and show that risks can be safely managed without increasing danger to existing residents. This proposal does not provide convincing evidence of long-term resilience.									compromised when incidents occur. Adding thousands of households will significantly worsen congestion and response times. Without a third road or alternative access route, the proposed development is unsafe and unsustainable, placing future and current residents at unnecessary risk. 3. Infrastructure Constraints Healthcare: Canvey's existing GP surgeries, dental practices, and Southend/Basildon hospitals are already overstretched. There is no evidence of additional provision to meet the huge demand this development would generate. Education: Local schools are near or at capacity. No concrete plans for new		

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								Climate change forecasts indicate rising sea levels and more intense rainfall events, which will further increase the risk beyond current predictions. 2. Transport and Access (No Third Road) Canvey Island currently has only two access roads (Canvey Way and Somnes Avenue), both of which are heavily congested at peak times.									schools or expansions have been presented. Utilities and Drainage: The island's drainage and sewage systems are known to be fragile, with regular surface water flooding after heavy rainfall. Adding thousands more households will overload these systems. Emergency Planning: In a flood or evacuation scenario, current infrastructure could not safely support the island's existing population, let alone an expanded one. 4. Scale and Sustainability The scale of 3,316 houses is disproportionate to the size and capacity of Canvey Island. Sustainable development must balance housing needs with environmental, safety, and community		

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								Emergency services access is already compromised when incidents occur. Adding thousands of households will significantly worsen congestion and response times.									impacts. This proposal fails to meet that balance.		
0134001	Individual	Bridie Anne	Kikeros		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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								consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	options have been considered through the SFRA.	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0135001	Individual	Hayley	Cregan		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally complia	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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								nt. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01360001	Individual	Lorraine	Adams		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the

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

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								consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01380001	Individual	Jane	Davis		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to

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								Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01390001	Individual	Shelley	Neill		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS

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								Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
014000	Individual	Lee	Summerfield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting	Y - Policy SD3(3) 3. Proposals must

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

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0141-0001	Individual	Sean	Marney		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	emergency evacuation procedures.		
01420001	Individual	Jemma	Roche		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0143001	Individual	Paul	Turmaine		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0144-0001	Individual	Samantha	Blewer		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								land supply.									geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0145-0001	Individual	Pat	Taylor		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic

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								credible five-year housing land supply.									not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Flood Risk Assessment (SFRA).
01460001	Individual	Jacqueline	Cranfield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and

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								Thundersley. It has no credible five-year housing land supply.			3,316+ urban homes for Canvey is not resident led.						Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		the Castle Point Strategic Flood Risk Assessment (SFRA).
01470001	Individual	Bradley	Swann		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternati	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS

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								ves like North West Thundersley. It has no credible five-year housing land supply.			appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0148001	Individual	Paul	Williamson		Yes	SP3	No	I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey SuDS	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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								alternatives like North West Thundersley. It has no credible five-year housing land supply.			areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey Island doesn't have the infrastructure to deal with 3000+ new homes. As it is there is very limited doctors places and very difficult to get a dentist. The current road network would not cope with the extra traffic.						development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	options have been considered through the SFRA.	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01490001	Individual	Michael	Brown		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally complia	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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								nt. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0150001	Individual	Jessica	Osborne		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the

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

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								consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01520001	Individual	Daphne	Brown		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to

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								Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01530001	Individual	Janice	Osborne		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS

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								Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
015400	Individual	Anne Marie	Dennis		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting	Y - Policy SD3(3) 3. Proposals must

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

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015-0001	Individual	Stephen	Osborne	Not stated	Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	emergency evacuation procedures.		
0156001	Individual	Ian	Whittock		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	> I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Ultimately, if housing is required on Canvey Island, increased infrastructure needs to be first, and not after the new housing.	PROPOSED MODIFICATION: Add North West Thundersley site. There has been no new road off Canvey Island since the 1970s, the population has tripled and the per person number of cars has increased. Also consider the option of a train station on Canvey Island.... does that sound difficult? Well so does living without adequate links and increased population and a flooding safety hazard. The housing quota should also at least be equally divided among the district, with Daws Heath also being considered (although I do assume that councillors live there so don't want to devalue their own area?). Daws Heath has great access to the A127 so	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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												could increase the use of St Michael's Road. Any housing planned should be in the character of the area. E.g. bungalows and houses. Not blocks of flats that would alter the character of the area to something of a London suburb.					resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0157001	Individual	SJ	Murray		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle

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											is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' <i>the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'</i>	Point Strategic Flood Risk Assessment (SFRA).

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01580001	Individual	C J	Murray		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
01610001	Individual	Norma	Blamey		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason:	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option for 7,500 homes. Reduce the urban housing target to 3,500 from 6,200, with Canvey at 1,050. Total housing target of 11,000.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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								Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.			directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Canvey SuDS options have been considered through the SFRA.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0162001	Individual	Gabriella	Kwolk		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of	PROPOSED MODIFICATIONS: Add North West Thundersley site	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure

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								compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.			North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	re network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01640001	Individual	Paul	Harbord		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character

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								alternatives like North West Thundersley and it has no credible five-year housing land supply.			Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estates as brownfield sites for development into mixed use housing and industrial areas has not fully considered the impact on micro, small, medium and large businesses currently operating on the estates that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor to zero engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estates. The future plans for Charfleets Industrial estates	housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Remove Manor Trading Estate site from the plan. Total housing target of 11,000.					site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis'	and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estates for housing, with business integrated with residential homes.							<i>uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'</i>	
01650001	Individual	Theresa	Merlane		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to NOT be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be UNSOUND. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes, reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, and a total housing target of 11,000.	Not Stated		No	A	The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", All our precious Greenbelt sites need total protection from government intervention. it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and North West Thundersley site. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the	Green Belt/Grey belt covered under policy GB2. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											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.						over development of our urban sites, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
01660001	Individual	Peter	Artley		Not Stated	SP3	Not Stated		No	Justified, Consistent with National policy	I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of	Not Stated		No		It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new	Green Belt/Grey belt covered under policy GB2. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not	N

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											against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications.	our urban sites. Considering NW Thundersley will give a housing target of 11000.					NPPF guidelines. Current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0167001	Individual	Vivien	Drewer		Not Stated	SP3	Not Stated	Hi Very pleased to see that no green or grey belt land will not be built on. We must protect our environment, we need the trees to	Not Stated				Not Stated		No		Very pleased to see that no green or grey belt land will not be built on. We must protect our environment, we need the trees to breathe and woods, fields and green spaces for wild life. Benfleet in particular doesn't have the infrastructure to	Support norted.	N

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								<p>breathe and woods, fields and green spaces for wild life. Benfleet in particular doesn't have the infrastructure to cope with over development. We put our trust in our local council and I think under all the pressure they are so under for development they have been strong enough to have saved our green belt.</p>									<p>cope with over development. We put our trust in our local council and I think under all the pressure they are so under for development they have been strong enough to have saved our green belt.</p>		

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01680001	Individual	Barbara	Topham		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000. A third road off the Island is a necessity before any such plans should be considered.	No		No	A	Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Object for proposals for residential on Charfleets	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. It also does not take into account the additional traffic to be added to the already extremely congested daily traffic problems. Also doesn't consider the local infrastructure and the need of extra dentists, doctors surgeries and schools which will be required.										Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
0169001	Individual	Sharon	Mansfield		Not Stated	SP3	Not Stated	Please accept this email as my opposition to the plan as I have found it very difficult and	Not Stated	Not Stated	I accept new houses are needed but the volume Canvey island is expected to undertake with this plan will be detrimental to the island and residents. What would happen if there was a problem at the oil refinery or a flood with only one road for everyone to exit. I don't pretend I know anything about planning but as a resident I know building more than 3000		Yes		No	A	Total housing allocated cannot be delivered without proper infrastructure and services. Canvey access: at present our only exit of Canvey is via waterside farm so in theory we only have one	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site			

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								frustrating filling in the online form. As a resident of Canvey I represent not only myself but 4 other family households who have equally struggled with the form. Our objections are that the total housing allocated cannot be delivered without proper infrastructure and services at present our only exit of Canvey is via watersid			houses without better access for everyone is not viable. I understand there are more sustainable options in hadleigh & Benfleet (blinking owl).						exit not 2. congestion for this area is already a big concern. Over the last 39years more houses have been built with less amenities ie schools and doctors which has created problems for residents children have to go off the island for schools and with the traffic this is a nightmare. Canvey is unique in respect of it's below sea level position with this comes extra problems with flooding and definitely bad drainage. I accept new houses are needed but the volume Canvey island is expected to undertake with this plan will be detrimental to the island and residents. Emergencies: What would happen if there was a problem at the oil refinery or a flood with	assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025	circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								<p>e farm so in theory we only have one exit not 2. congestion for this area is already a big concern. Over the last 39years more houses have been built with less amenities ie schools and doctors which has created problems for residents children have to go off the island for schools and with the traffic this is a nightmar</p>									<p>only one road for everyone to exit. I understand there are more sustainable options in hadleigh & Benfleet (blinking owl).</p>	<p>North West Thundersley transport evidence.</p>	

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								e. Canvey is unique in respect of it's below sea level position with this comes extra problems with flooding and definitely bad drainage.											
01730001	Individual	Mark	Burton		Yes	SP3	No	Dear Sir/Madam, I am writing to formally object to the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT support the draft plan, as I do not consider it to be legally compliant or sound.			Soundness The draft local plan is not justified or consistent with national policy. The housing target for Castle Point is not being met appropriately. The site selection process is biased, predetermined towards a "no greenbelt build policy," and based on the overdevelopment of brownfield sites. Greenbelt and Grey Belt sites have not been properly considered, specifically excluding North West Thundersley. Flood Risk and Infrastructure NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Canvey Island is uniquely vulnerable due to its geography and drainage infrastructure, making large-scale development unsafe. Sustainable drainage	Proposed Modification Add North West Thundersley as a housing site option.	Not Stated		No		Proposed allocation to Canvey Island is disproportionate. Inadequate appreciation of the importance of flood considerations throughout, even regarding Canvey. Sustainable drainage measures are not suitable for Canvey Island.. Canvey Island is uniquely vulnerable due to its geography and drainage infrastructure, making large-scale development	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS

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								Legal Compliance The plan fails to consider strategic alternatives such as North West Thundersley. * It does not provide a credible five-year housing land supply.			measures are not suitable for Canvey Island. Building 3,300+ homes on Canvey will put residents at significant risk in the event of an emergency evacuation. The current plan does not address essential infrastructure improvements required to support this scale of development.						unsafe. Building 3,300+ homes on Canvey will put residents at significant risk in the event of an emergency evacuation. The current plan does not address essential infrastructure improvements required to support this scale of development.	respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0175001	Individual	Laura	Long		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's

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								alternatives like North West Thundersley. It has no credible five-year housing land supply.			Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0176001	Individual	Debie	Wood		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure

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

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								DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	ces, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0178001	Individual	Wendy	Neville		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt /	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes.	Y - Policy SD3(3) 3. Proposals must demonstrate how the

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								Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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0179001	Individual	Tracy	Sewell		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	homes puts residents in the East at risk with emergency evacuation procedures.		
0180001	Individual	Lynda	Farrer		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0181-0001	Individual	Brian	Stone		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								housing land supply.									measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Assessment (SFRA).
01820001	Individual	Patria	Beasley		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								West Thundersley. It has no credible five-year housing land supply.			drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0183001	Individual	Dawn	Wheeler-Boreham		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason:	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDs feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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								It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Canvey SuDS options have been considered through the SFRA.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01840001	Individual	Deby	Harris		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character

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								plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0185001	Individual	Samantha	Duffield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and

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								Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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0190001	Individual	Margaret	Blamey		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	homes puts residents in the East at risk with emergency evacuation procedures.		
01910001	Individual	Mark	Duffield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
01920001	Individual	Alysa	Duffield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								housing land supply.									measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Assessment (SFRA).
01930001	Individual	Paul	Holland		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for

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								West Thundersley. It has no credible five-year housing land supply.			drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0194001	Individual	Louise	Holland		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason:	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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								It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Canvey SuDS options have been considered through the SFRA.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0195001	Individual	Dulcie	McGovern		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character

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								plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0196001	Individual	John	Steward		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and

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								Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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01970001	Individual	Caroline	West		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	homes puts residents in the East at risk with emergency evacuation procedures.		
0198001	Individual	Donna	Garner		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0199-0001	Individual	Julia	Connor		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								housing land supply.									measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Assessment (SFRA).
0200001	Individual	Sue	Jackson		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for

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								West Thundersley. It has no credible five-year housing land supply.			drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
02010001	Individual	Lisa	Haggerty		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason:	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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								It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Canvey SuDS options have been considered through the SFRA.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
020200001	Individual	Clare	Fenlon		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character

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								plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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0200001	Individual	Paul	Overbury		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
02040001	Individual	Maeve	Johnstone		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate	No		No	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt,	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to	

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								it has no credible five-year housing land supply.			development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with	site from the plan. Total housing target of 11,000.					Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											businesses integrated with residential homes.								
02050001	Individual	Haley	Cockayne		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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

ID Ref	Individual/Or organisation/A gent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
02060001	Individual	Simon	Stallwood		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.						Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
02070001	Individual	Richard	Smitten		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of	No		No	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's	

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								housing land supply.			measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.	11,000. Note, I do not wish to participate at the oral examination.					NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
02080001	Individual	Gavin	Culff		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternati	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to	No	No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the	

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								ves like North West Thundersley and it has no credible five-year housing land supply.			considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.	3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.					West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' <i>the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable</i>	green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		<i>prospect for the site to be used for these purposes'</i>	
02090001	Individual	Pauline	Basford		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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											mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.						appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Assessment (SFRA).
0210001	Individual	Andrew	Johnstone		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield	No		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstan

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								failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial	site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.				Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets				not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature	ces, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.							<i>unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'</i>	
02120001	Individual	Gemma	Campbell		Not Stated	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. I have lived on Canvey island for over [REDACTED] and love it here. However the traffic has become	Not Stated				Not Stated		No		Traffic will not cope with the level of housing proposed on Canvey. Also no capacity to cope in schools, doctors	Highways Impacts: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Infrastructure matters (including education and health services) recovered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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								a nightmare even on a good day. How you expect to build 3000 new homes which will bring double the amount of cars I do not understand. I am already considering moving off the island as it has become a joke. I work in [REDACTED] and the journey takes 30mins however in the morning I have to allow 1.5hrs to get to work. This will increase											

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								even more with extra housing. We do not have the capacity to cope in schools, doctors & the traffic. It is absolutely mad that this is even being considered. Clearly someone who doesn't live on Canvey has come up with the idea.											
02130001	Individual	Julie	Russell		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy' The site selection is solely based	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstan

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								failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			on the 'over development of Brownfield sites'. The plan has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The NPPF guidelines state development should be directed away from areas at highest risk of flooding. SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led.	site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	ces, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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02140001	Individual	Lynsey	Cutts		Not Stated	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local	No	Justified, Consistent with National policy	That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this	Recommendation to include North West Thundersley in the plan as a strategic housing growth site. The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in			response regarding the draft plan are: • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. • The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. • The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. • North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. • The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the	Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary								of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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								and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength				Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is	infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglens Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130										

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								of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council			absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but	corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with										

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								meaningless.			national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The NPPF is clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst.	Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant											

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											<p>These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure</p>	<p>housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also</p>										

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											<p>limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to</p>	<p>reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a</p>									

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

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

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											represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before													

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											submission to the Planning Inspectorate.								
0215-0001	Individual	Jackie	Gross		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy' The site selection is solely based on the 'over development of Brownfield sites'. The plan	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape

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								failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			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.	housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000					Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SuDS: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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

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																	Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.			
02180001	Individual	Simon	Hart		Not Stated	SP3	Not Stated		No	Not Stated	Dear Inspector of the Castle Point Plan, I have been a resident of Castle Point for [Redacted Personal Information], and a former Cllr of Castle Point, who has been involved in previous local plans and the very early stages of this plan. I would like to submit a brief opinion on this plan. First of all, the housing target for Castle Point is too high. This is not a NIMBY comment but one of simple fact, due to its topography, location, and highway structure. Any development in Southend, Rochford, and Rayleigh has to come through the Castle Point entry and exit points and on to Basildon. The current Castle Point Plan of over 6,000 homes within the urban areas will destroy the area completely, using most of the open areas, massively overdeveloping the urban areas, and increasing the housing density to an unacceptable level. The internal highway structure of Castle Point is generally at near capacity and massively at over capacity at peak times without this planned		Not Stated		No			The housing target for Castle Point is too high. This is not a NIMBY comment but one of simple fact, due to its topography, location, and highway structure. Any development in Southend, Rochford, and Rayleigh has to come through the Castle Point entry and exit points and on to Basildon. The current Castle Point Plan of over 6,000 homes within the urban areas will destroy the area completely, using most of the open areas, massively overdeveloping the urban areas, and increasing	Comments noted. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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

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																	I am not against development, as proven in my term as Chairman of Development Control , but must be right numbers in the right place .		
0219-0001	Individual	Graham	Bracci		Yes	SP3	Yes	1.01 Canvey Island is the most Densely Populated and Deprived part of Castle Point. Despite its social challenges and constrained infrastructure, it hosts 2 Top Tier COMAH sites, in very close proximity to the Residential neighbourhoods. These sites pose risks of catastrophic	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process			Does not meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The Plan lacks proportionate evidence and fails to consider reasonable alternatives The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie	Noted	N

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								<p>incidents due to mechanical failure, human error, or external threats. Increasing residential density near such installations elevates the potential consequences of a major incident. The COMAH regulations and associated Hazard Ranges are designed to limit exposure—not expand it. The juxtaposition of high-density housing with high-risk</p>			<p>concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey.</p> <p>Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner.</p> <p>2. Is the Plan Justified ?</p> <p>The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided.</p> <p>The plan increases population exposure in the vicinity of known COMAH sites hazard range</p>							<p>within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The Plan fails to meet the housing targets set by the Standard Methodology</p>		

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								industrial infrastructure is antithetical to sustainable land-use planning . 1.02 Canvey Island is at, or just below Sea Level apart from a small area known as Canvey Heights. It is designated a Flood Zone 3A area. Whilst it has Sea Defences, it remains at Residual and Actual Risk of Tidal Flooding , a substant			consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan's ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and										

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								ial planning issue. With the rising sea level, due to climate change, the protection afforded by these existing defences is decreasing, and is likely to fall below current target levels within the lifetime of any new developments. 1.03 Indicative flood defence raising requirements are as follows: <ul style="list-style-type: none"> • About 0.3m in 2040 (to a 			infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality,										

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								level of 6.7m AOD) • A further 1.4m in 2070 (to a level of 8.1m AOD) These increases depend on the rate of sea level rise. 1.104 These aspirational new raised sea defences may actually harm the sustainability of Canvey Island as a desirable location to live. "Whilst hard defences could potentially be raised within existing footprints, the			subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough's communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.									

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								structures would be tall, unattractive and restrict public access.” 2 1.05 Castle Point Borough Council, within Planning Matters suggest, as a general approach that “the continued development of Canvey Island is necessary to sustain the local community and prevent the social and economic blight of the settlement”. 3 1.06 However, this											

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								claim overlooks the NPPF requirement to avoid new housing in highconsequence flood zones unless there are no reasonably available lower-risk sites. Being such a small Borough, it is difficult to suggest that there are no more suitable sites in the near vicinity in lower Flood Risk Zones. 1.07 To claim that housing											

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								development improves "sustainability" in this context ignores the fundamental principle of avoiding development in high-consequence flood zones, as emphasised in the NPPF and Strategic Flood Risk Assessments. 1.08 True sustainability involves balancing environmental constraints, social well-being,											

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								and economic viability. Adding residential housing in a location with constrained evacuation routes, ageing infrastructure, and limited resilience planning, does not meet this balance. This does not comply with the NPPF's Sequential Approach to Strategic Development Site Selection. 1.09 We are mindful of Castle											

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								Point Borough Council own officers advice to Councillors; "Given the risk to the population, various measures are required to deal with the concerns to human health and wellbeing. These include: <ul style="list-style-type: none"> • The need for an emergency plan to be in place; • The need for sea defences to be maintained and improved; • The need to maintain the populati 												

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								on living in the flood risk zone at current levels or lower;" (My emphasis) 4.1.10 Also, Advice to CPBC, contained in the current Strategic Flood Risk Assessment Level1 "Recommendation 4-2 CPBC should pursue opportunities to move existing development from within the floodplain to areas with a lower risk of flooding." (My											

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								emphasis) 1.11 To propose a Mixed Use Development at West Canvey will necessitate the use of Green Land, an area which, alongside other green areas, fulfilled an essential flood prevention purpose for nearby land during the Canvey Island 2014 Summer Flooding . Plus it will increase the Population at Risk of Flooding											

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								and a Hazardous Industry incident. 1.12 Essex County Council produced a 41 page Flood Investigation Report, into the "Canvey Island 2014 Summer Flood." 5 This document was highly informative of the devastation caused and the shortcomings and failures of the various infrastructure and agencies, during the event. 1.13											

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								Following this the "Canvey Island 6-Point Plan" 6 was produced to attempt to raise Government assistance in Funding. "The cost of a future flooding incident on the Island would be in the region of £274m per year in lost economic output, and up to £2.1bn in damage to residential property." "Unless a strategic and wide reaching												

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								flood mitigation programme can be implemented, site based flood mitigation could be seen by developers as too expensive and fragmented.”” In order to deliver this vital plan, all relevant agencies and central government need to work together and address the £24.5m funding shortfall. ” 1.14 The approach to Government											

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								n. For example, the Council's own Sustainability Appraisal is unclear as to why the most sustainable Green Belt site was discounted. I therefore consider the Council needs to revisit its assessment of Green Belt locations paying particular regard to the five purposes of the Green Belt as set out in PPG2. I accept that other											

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								overall distribution of growth promoted in the Core Strategy. In this respect, I consider it would be difficult to endorse a strategy which commits to Green Belt release in an area of potential high flood risk at Canvey Island yet fails to identify more than a token amount of land on the mainland where flooding is not a significant issue.											

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								of population of Canvey Island at Risk of Flooding and / or a Hazardous Industrial Incident, caution should be applied and Development should be planned-for in a limited fashion by means of Regeneration. Thus providing work for the local Building Industry. 1.19 In these circumstances there is no place for the "Local											

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								Factors” previously recognised by Planning Inspector Mr P.Crysell, see above, to remain an influence on the skewed Housing Development Distribution contained within this latest version of the CPBC Plan. 1.20 Whilst this approach may be considered radical, we consider it essential that the Population level of											

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

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0220001	Individual	Steve	Sawkins		Yes	SP3	Yes	1.01 Canvey Island is the most densely populated and deprived part of Castle Point. Despite its social challenges and constrained infrastructure, it hosts 2 Top Tier COMAH sites, in very close proximity to the residential neighbourhoods. These sites pose risks of catastrophic incidents due to mechanical failure, human error, or external threats. Increase	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process		C	Does not meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The Plan lacks proportionate evidence and fails to consider reasonable alternatives The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged	Noted	N

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								ng residential density near such installations elevates the potential consequences of a major incident. The COMAH regulations and associated Hazard Ranges are designed to limit exposure—not expand it. The juxtaposition of high-density housing with high-risk industrial infrastructure is antithetical to sustainable land-use planning			for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation .						but not resolved through binding delivery mechanisms. The Plan fails to meet the housing targets set by the Standard Methodology		

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								<p>1.02 Canvey Island is at, or just below Sea Level apart from a small area known as Canvey Heights. It is designated a Flood Zone 3A area. Whilst it has Sea Defences, it remains at Residual and Actual Risk of Tidal Flooding, a substantial planning issue. With the rising sea level, due to climate change,</p>			<p>Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan's ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This</p>									

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								the protection afforded by these existing defences is decreasing, and is likely to fall below current target levels within the lifetime of any new developments. 1.03 Indicative flood defence raising requirements are as follows: <ul style="list-style-type: none"> • About 0.3m in 2040 (to a level of 6.7m AOD) • A further 1.4m in 2070 (to a level of 8.1m AOD) These			is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively										

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								<p>increase depend on the rate of sea level rise. 1.04 These aspirational new raised sea defences may actually harm the sustainability of Canvey Island as a desirable location to live. "Whilst hard defences could potentially be raised within existing footprints, the structures would be tall, unattractive and restrict public access."</p> <p>2.1.05</p>			<p>prepared nor adequately evidenced.</p> <p>The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse.</p> <p>Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough's communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.</p>										

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								Castle Point Borough Council, within Planning Matters suggest, as a general approach that "the continued development of Canvey Island is necessary to sustain the local community and prevent the social and economic blight of the settlement". 3.1.06 However, this claim overlooks the NPPF requirement to avoid new housing in											

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								highconsequence flood zones unless there are no reasonably available lower-risk sites. Being such a small Borough, it is difficult to suggest that there are no more suitable sites in the near vicinity in lower Flood Risk Zones. 1.07 To claim that housing development improves "sustainability" in this context ignores the											

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								fundamental principle of avoiding development in high-consequence flood zones, as emphasised in the NPPF and Strategic Flood Risk Assessments. 1.08 True sustainability involves balancing environmental constraints, social well-being, and economic viability. Adding residential housing in a location											

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								with constrained evacuation routes, ageing infrastructure, and limited resilience planning, does not meet this balance. This does not comply with the NPPF's Sequential Approach to Strategic Development Site Selection. 1.09 We are mindful of Castle Point Borough Council own officers advice to Councillors; "Given the risk											

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								to the population, various measures are required to deal with the concerns to human health and wellbeing. These include: <ul style="list-style-type: none"> • The need for an emergency plan to be in place; • The need for sea defences to be maintained and improved; • The need to maintain the population living in the flood risk zone at current levels or lower;" (My emphasi													

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								s) 4 1.10 Also, Advice to CPBC, containe d in the current Strategic Flood Risk Assessm ent Level1 "Recom mendati on 4-2 CPBC should pursue opportu nities to move existing develop ment from within the floodplai n to areas with a lower risk of flooding." (My emphasi s) 1.11 To propose a Mixed Use Develop ment at West Canvey												

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								will necessitate the use of Green Land, an area which, alongside other green areas, fulfilled an essential flood prevention purpose for nearby land during the Canvey Island 2014 Summer Flooding . Plus it will increase the Population at Risk of Flooding and a Hazardous Industry incident. 1.12 Essex County Council produce											

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								local needs and to support services, I am not convinced that maintaining the current distribution of development across the Borough is justified given the existing constraints.” 8 1.18 Rather than developing more housing at a rate that will inevitably increase the numbers of population of Canvey Island at Risk of Flooding and / or a Hazardo											

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								us Industrial Incident, caution should be applied and Development should be planned-for in a limited fashion by means of Regeneration. Thus providing work for the local Building Industry. 1.19 In these circumstances there is no place for the "Local Factors" previously recognised by Planning Inspector Mr P.Crysell											

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								, see above, to remain an influence on the skewed Housing Development Distribution contained within this latest version of the CPBC Plan. 1.20 Whilst this approach may be considered radical, we consider it essential that the Population level of Canvey Island be maintained at the same level, or lower, and that the											

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								Constraints indicated within the NPPF are justly applied for the benefits of the Health, Safety and Well-being of all Canvey Islanders. The Regeneration of Brownfield land should be the approach to enable Sustainable Development for Canvey Island.											
0221-0001	Individual	Georgina	Morris		Not Stated	SP3	Not Stated	Homes to be built here should be shared out in other districts and don't	Not Stated	Not Stated			Not Stated		No		Homes to be built here should be shared out in other districts and don't agree with taking over protected land and trying to change the status of that land.	Comments noted	N

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								agree with taking over protected land and trying to change the status of that land											
0222-0001	Individual	Jonathan	Pinnock		Not Stated	SP3	Yes	Dear Sir/Madam, I have completed the online response and the id is in the title of this email. Since, there was only opportunity to respond to 20 individual policies, I would like to add that I am happy that the Castle Point Plan is overall "Sound"	Yes	Not Stated	Although my personal preference would be for no additional housing in Castle Point (due to already over-stretched infrastructure and resources), I understand the unacceptable pressure applied to CPBC by the National Government and I therefore accept the Plan as a reasonable compromise. I also recognise that certain individuals from the local Conservative party (who had previously failed to produce a Plan themselves before they were voted out of office), are actively trying to derail the Plan for their own purposes and have been spreading fear and misinformation amongst CPBC residents. I am concerned that their actions may directly result in far larger housing targets set by National Government than are in the current Plan, and may also result in the loss of Green Belt land which has been the concern uppermost in most residents minds over at least the past 20 years. I would respectfully ask that the Government Inspector takes note of these facts and		Not Stated		Not Answered		I would like to add that I am happy that the Castle Point Plan is overall "Sound" and has been legally prepared. I am grateful that the public have had plenty of opportunity to respond at various stages and that very detailed evidence has been provided to support the policies in the Plan. It is a far more robust and reasonable Plan compared with any which I have reviewed in the past 20 years or so. Although my personal preference would be for no additional housing in Castle Point	Comments noted	N

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								and has been legally prepared. I am grateful that the public have had plenty of opportunity to respond at various stages and that very detailed evidence has been provided to support the policies in the Plan. It is a far more robust and reasonable Plan compared with any which I have reviewed in the past 20 years or so.			concerns when reviewing the Plan. I would add that I am not, nor do I intend to be a member of any political party.						(due to already over-stretched infrastructure and resources), I understand the unacceptable pressure applied to CPBC by the National Government and I therefore accept the Plan as a reasonable compromise. I also recognise that certain individuals from the local Conservative party (who had previously failed to produce a Plan themselves before they were voted out of office), are actively trying to derail the Plan for their own purposes and have been spreading fear and misinformation amongst CPBC residents. I am concerned that their actions may directly result in far larger housing targets set by National Government than are in the current Plan, and may also		

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																	result in the loss of Green Belt land which has been the concern uppermost in most residents minds over at least the past 20 years. I would respectfully ask that the Government Inspector takes note of these facts and concerns when reviewing the Plan. I would add that I am not, nor do I intend to be a member of any political party.		
0223-0001	Individual	Brian	Botham		Not Stated	SP3	Yes	Hello, My name is Brian Botham, I am a Town Councillor but I am writing as a private individual. I write with regard to the proposed local plan. Is it legally complia	Yes		The question of the plan being sound, I would expect that it is. I am sure that the borough council has invested a great deal of time, effort and money in making sure that the plan is sound. What I believe needs to be done is for the borough to arrange a meeting with the Housing Minister, go to Westminster and explain why Canvey Island is a special case and why mass building here is such a bad idea. The Canvey Island Independent Party was elected on their mandate to stop the overdevelopment of Canvey Island, by pushing this plan through, you are going against your electoral promise to the people who put you in power. This plan will not work for		Not Stated		No		Not the right Plan for Canvey Island You cannot honestly expect to build another 3300 homes on an already overpopulated island. Our infrastructure will not cope with the increased traffic, our local services; doctors, dentists and schools etc will not be able to meet demand. There is also the ever present flood	Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Impacts upon natural environment covered by policies	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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								nt? again I would have thought that council has carried out due diligence and that the plan conforms to government guidelines. But is the plan right for Canvey Island? The answer to that is a resounding NO! You cannot honestly expect to build another 3300 homes on an already overpopulated island. Our infrastructure will not cope with the			Canvey and will undoubtedly bring problems beyond belief if it it accepted.						risk. Many areas in west Canvey where the majority of building is planned, is on marsh land or areas of conservation. What I believe needs to be done is for the borough to arrange a meeting with the Housing Minister, go to Westminster and explain why Canvey Island is a special case and why mass building here is such a bad idea. This plan will not work for Canvey and will undoubtedly bring problems beyond belief if it it accepted. I have recently written to you making objections to the proposed plan. Something that I really should have mentioned and didn't are the two COMAH sites on Canvey, one of which supplies aviation fuel to the RAF, this must surely qualify as a	and supporting evidence. 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.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								increase d traffic, our local services; doctors, dentists and schools etc will not be able to meet demand. There is also the ever present flood risk. Many areas in west Canvey where the majority of building is planned, is on marsh land or areas of conservation. Also I do not believe that the views and concerns of the local people have									potential terrorist target.		

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								been fully taken into consideration. If this plan goes ahead, Canvey Island will be transformed from what it is today to just another concrete borough like Newham.											
0225-0001	Individual	Warren	Armstrong		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant.	No	Justified, Consistent with National Policy	The plan has not conducted upto date flood assessments for the areas of concern, and ignores very serious concerns around infrastructure and safety given Canvey's flood risk. I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield	> PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option.	Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered.	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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								Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.			sites'. The proposed site additionally does not provide the appropriate infrastructure for the additional dwellings. Services on Canvey are all ready over subscribed. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
02260001	Individual	Janine	Ford		Not Stated	SP3	Not Stated		Not Stated		Dear Sirs, Please read attached letters sent to the Echo. From[Redacted Personal Information] Dear Sirs, Please read the above emails sent to the Echo. I believe that they reflect the point of view of the vast majority of Canvey residents. We are extremely despondent that are views will be regarded as valid. Yours		Not Stated		Yes	A	RE: Canvey residents have been well and truly 'shafted' in Castle Point Plan being allocated 3,316 new homes. Far more than other local areas. This despite Canvey already being in desperate need	Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a	N

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											faithfully [Redacted Personal Information] to the Echo						of a second access route, having significant hazardous material storage and not forgetting Canvey is below sea level. 3,316 houses on Canvey - how can that be viable, fair or SAFE!.	range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE.	

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

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								ld and 1.40 vehicles per household in the East of England, could add approximately 7,400 residents and 4,400 vehicles. The plan seeks to enhance connectivity through highway, public transport, and other travel improvements, but lists only minor upgrades such as junction improvements for example Somnes Avenue/ Link Road and bus			plan allows delays if gaps arise, but provides no statements or committed budgets, making delivery not effective. 5. Sequential and Exception Tests for Canvey Flood Zone 3a Canvey Island is largely in Flood Zone 3a; the plan applies the sequential test by prioritising non flood risk sites but allocates over half of the development on Canvey, mainland alternatives exist but are dismissed. This may not fully comply with NPPF flood risk policies. 6. Drainage, Flooding Risks, and COMAH Sites The planned growth on Canvey increases exposure without detailed risk assessments for COMAH and flooding scenarios, potentially failing effectiveness. The plan requires site specific FRA's for developments in flood zones and incorporating sustainable drainage systems (SuDS) of 90 litres per person day water efficiency, but no details on deliverability.						enhancements, without addressing major access needs. A feasibility study for access improvements is referenced, but no deliverable scheme for a third road is identified, despite requirements. This level of housing to Canvey Island is reliant on major transport infrastructure upgrades of which no real study of sustainability or proof of agreement or funding is available, therefore rendering the plan not effective. As growth occurs, shared highways the impacts are not mitigated, therefore likely a failure of duty to cooperate over cross-boundary infrastructure burdens. 2. Applicability of North West Thundersley	SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	

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								enhancements, without addressing major access needs. A feasibility study for access improvements is referenced, but no deliverable scheme for a third road is identified, despite requirements. This level of housing to Canvey Island is reliant on major transport infrastructure upgrades of which no real study of sustainability or proof of									SoCG to Canvey Infrastructure The plans approach to North West Thundersley highlights significant highways and transportation constraints that cannot be easily mitigated (as noted in the related SoCG). Similar constraints apply to Canvey, where the plan recognises access bottlenecks but defers major solutions to future studies. The SoCG indicates that funding for infrastructure cannot impose an unaffordable public purse burden, which aligns with ECC's positions in other contexts. Without evidence of ECC commitment to funding major works like a third road (estimated at hundreds of millions), the plans reliance on such studies		

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								agreement or funding is available, therefore rendering the plan not effective. As growth occurs, shared highways the impacts are not mitigated, therefore likely a failure of duty to cooperate over cross-boundary infrastructure burdens.									undermines its justification and effectiveness. 3. Reliance on Developer Contributions and Lack of SoCG with ECC Infrastructure delivery relies primarily on developer contributions. Viability assessments allow reductions if contributions are unviable. The plan claims SoCG's with ECC on highways and education, but no published evidence confirms agreements on Canvey specific infrastructure. 4. Lack of Evidence for Financial Backing Funding sources are indicative, primarily reliant on developer contributions and potential grants. No secured funding for all upgrades. The plan allows delays if gaps arise, but		

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																	<p>provides no statements or committed budgets, making delivery not effective.</p> <p>5. Sequential and Exception Tests for Canvey Flood Zone 3a Canvey Island is largely in Flood Zone 3a; the plan applies the sequential test by prioritising non flood risk sites but allocates over half of the development on Canvey, mainland alternatives exist but are dismissed. This may not fully comply with NPPF flood risk policies.</p> <p>6. Drainage, Flooding Risks, and COMAH Sites The planned growth on Canvey increases exposure without detailed risk assessments for COMAH and flooding scenarios,</p>		

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																	potentially failing effectiveness. The plan requires site specific FRA's for developments in flood zones and incorporating sustainable drainage systems (SuDS) of 90 litres per person day water efficiency, but no details on deliverability.		
02280001	Individual	Charles	Hayden		Not Stated	SP3	Not Stated	Why on earth would you want to build more houses on Canvey Island it cannot deal with the traffic now so if you decide to build more homes	Not Stated	Not Stated			Not Stated		No		Too many houses proposed for Canvey Island. Traffic already a problem. Concerned if there was a future emergency.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a	N

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								what would happen in an emergency you people that give the go ahead obviously do not live on Canvey Island if there was an emergency at the moment without any new homes it would be a struggle to get of, so in the event of an emergency who would take responsibility I bet it would be pushed from one person to another meaning nobody would , I										range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	

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								Speak for everyone who live on Canvey Island, it's disgusting how people hear get treated.											
0240001	Individual	Heleen	Sweeney		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible	No	Justified, consistent with National Policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away	Consideration of All Sites: All reasonable options were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								five-year housing land supply.									from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Assessment (SFRA).
0243-0002001	Individual	Jan	Payne		Not Stated	SP3	Not Stated	Firstly, we would like to thank you for protecting our green belt and for listening and responding to the concerns and suggestions raised by the residents in the previous	No	Not Stated			Not Stated		No	B - see 0243-0002 to 0003	Support the protection of the green belt. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? Canvey: Concerns with access and	Existing Commitments: Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). However, it is agreed that the plan could have been clearer on this point and a modification is proposed to signpost this reference in the supporting text. Canvey Access The plan has been subject to detailed	Y -Para 6.42 In addition to this planned supply, consideration has been given to supply already in the pipeline. These are sites that have already been granted planning permission, known as existing commitme

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								consultation. However, we would like to point out that we, along with many others, have found your on-line process for this consultation to be far too longwinded and very complex. You are asking for the general public to sit down and read hours' worth of documentation, (which is very hard to do if you only have access to only a mobile phone)									congestion. Policy Thun2: Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities- Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be reallocated, you have made no consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if	Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Thun2 allows for the existing facilities to be incorporated within an on-site redevelopment, so an offsite location may not necessarily be required. Parking provision covered under Policy T7. Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	nts. This pipeline of supply forms the starting point for the housing growth that will happen over the Plan period. As of 1st April 2025, development totalling 480 new homes had the benefit of planning permission. The housing trajectory which supports the Castle Point Plan is set out at Appendix 2 of the Housing Topic paper (August 2025)

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								and to fully understand all the implications and 'generic' statements. So, we hope that you'll accept our views as to why we believe certain policies are not SOUND, (we are not qualified to say whether your plans are legal or not) which we have opted to email, as your feedback form is too complicated and off-putting. We also suggest that you									you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and overpopulated. Parking: Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing		

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								read the Facebook page for Essex Planning where many others have expressed their views. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? With									obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer.		

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								regards to Canvey Island: We understand that you are trying to seek a third access road, but until you have concrete plans in place for this, how you can entertain building what appears to be the lion's share of the housing allocation for Castle Point on the Island? You will see comments on Facebook about how difficult it is to build on Canvey due to									No 5 year supply.		

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								the nature of the marshland and composition of the soil. We are also aware of how congested these roads become in peak hours and that's before any accidents which grid locks the whole area including the High Road in South Benfleet. Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward											

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								when you have no plan as to whether the existing facilities - Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be reallocated, you have made no consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation. What does this mean? That												

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								students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We											

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								welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and overpopulated. Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will											

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								walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's											

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								be safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have											

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								also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. You must remember that whatever you promise in the 'plan' regarding building targets, the government will expect you to adhere to. It can't be based on speculation or 'what ifs.' And as											

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								pointed out by Rebecca Harris, you have not specified an allocation that will be built within the next five years and neither have you put across a stronger enough case within the plan for falling short of the governments housing target for our Borough.											

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0240001	Individual	Keith	Payne		Not Stated	SP3	Not Stated	Firstly, we would like to thank you for protecting our green belt and for listening and responding to the concerns and suggestions raised by the residents in the previous consultation. However, we would like to point out that we, along with many others, have found your on-line process for this consultation to be far too longwind	No	Not Stated			Not Stated		No	B - see 024-0002	Support the protection of the green belt. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? Canvey: Concerns with access and congestion. Policy Thun2: Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities- Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be	Existing Commitments: Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). However, it is agreed that the plan could have been clearer on this point and a modification is proposed to signpost this reference in the supporting text. Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Thun2 allows for the existing facilities to be	Y -Para 6.42 In addition to this planned supply, consideration has been given to supply already in the pipeline. These are sites that have already been granted planning permission, known as existing commitments. This pipeline of supply forms the starting point for the housing growth that will happen over the Plan period. As of 1st April 2025, development totalling 480 new homes had the benefit of planning permission. The housing

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								ed and very complex . You are asking for the general public to sit down and read hours' worth of documentation, (which is very hard to do if you only have access to only a mobile phone) and to fully understand all the implications and 'generic' statements. So, we hope that you'll accept our views as to why we believe certain policies are not SOUND,									reallocated, you have made no consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation . What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and	incorporated within an on-site redevelopment, so an offsite location may not necessarily be required. Parking provision covered under Policy T7 . Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	trajectory which supports the Castle Point Plan is set out at Appendix 2 of the Housing Topic paper (August 2025)

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								(we are not qualified to say whether your plans are legal or not) which we have opted to email, as your feedback form is too complicated and off-putting. We also suggest that you read the Facebook page for Essex Planning where many others have expressed their views. We feel that you should have incorporated within the plan details of planning									overpopulated. Parking: Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an expensive		

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								applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? With regards to Canvey Island: We understand that you are trying to seek a third access road, but until you have concrete plans in place for this, how you can entertain building what									outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. No 5 year supply.		

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								s which grid locks the whole area including the High Road in South Benfleet. Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities - Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be position											

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								ed elsewhere? If they are to be reallocated, you have made no consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes											

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								the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space											

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								without it feeling very cramped and overpopulated. Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighboring											

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								<p>sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an</p>											

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								expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. You must remember that											

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								whatever you promise in the 'plan' regarding building targets, the government will expect you to adhere too. It can't be based on speculation or 'what ifs.' And as pointed out by Rebecca Harris, you have not specified an allocation that will be built within the next five years and neither have you put across a stronger enough											

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								case within the plan for falling short of the governments housing target for our Borough.											
02450001	Individual	Stephanie	Briggs		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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								North West Thundersley. It has no credible five-year housing land supply.			for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
02460001	Individual	Paul Leslie	Prosho		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. > I DO NOT consider the draft	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No		Not Stated		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the

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								plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0247001	Individual	Christine	Marshall		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan	No	Justified, Consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/Grey Belt against	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and	No		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA)	Y - Policy SD3(3) 3. Proposals must demonstrate how the

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								Regulation 19 Draft is not legally compliant, as it has failed to consider strategic alternatives, for instance, North West Thundersley as it has no credible five-year housing land supply.			new NPPF guidelines. The draft local plan isn't justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy' The site selection is solely based on the 'over development of Brownfield sites'. The plan has not considered all sites, with no Greenbelt/Grey Belt sites added, and the exclusion of the North West Thundersley site. The NPPF guidelines state development should be directed away from areas at highest risk of flooding. SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led.	sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency	and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	evacuation procedures.		
02490001	Individual	Deborah	Bryant		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small,	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.	Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	

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0250001	Individual	Anthony Shawn	Morley		Yes	SP3	No	> Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. > Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. > Remove Charfleets Industrial Estate site from the plan. > Total housing target of 11,000.	No		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. > > Note, I do not wish to participate at the oral examination. > I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. > Please acknowledge receipt of my submission. Kind regards Mr Anthony Shawn Morley > 31 St Marks Road > Canvey Island > Essex > SS8 9NJ >											urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.	have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
0251001	Individual	Amanda	Jacobs		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and					

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								Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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02530001	Individual	Karen	Howe		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. As well as all the jargon Canvey is already overpopulated, should the Oikos aviation fuel terminal fail this would be a bigger disaster than Buncefield! The local councillors admitted to me at the meeting there are no evacuation planes in place for Canvey!! One little car crash and the island comes to a stand still. The site is right next to a site of Special Scientific Interest- one of only two in the world! How will this	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											effect the endangered species on this site with extra pollution a potential 6,000 plus extra cars will cause?! Very disappointed in Castle Point Council!!						urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Highlight the risks of the Oikos aviation fuel terminal. Concerned that there are no evacuation plans in place for Canvey.	have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Emergency Planning Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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02540001	Individual	Cheryl	Sammons		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered e.g. Greenbelt / Grey Belt sites. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Other examples of Canvey not being a viable alternative location are: Road network is already strangled by high volumes of traffic, in particular during rush hour periods. To address this would not only require the much needed third road being built but a major reworking of the existing routes so that they do converge at Waterside roundabout and more lanes being added. Also Sadlers farm roundabout was poorly designed as the route off the A13 is only 2 lanes and therefore includes traffic		Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and	N

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											<p>going to North and South Benfleet and the traffic going to Canvey has to sit in a queue and then negotiate 2 sets of traffic lights before getting onto a Canvey Way (aka Remembrance Avenue) which is only a single land road. The health care is also already stretched and without additional Doctors/Dentists etc would not be able to provide adequate care for the residents. Investment would require to be made in additional schools in particular another secondary school would be essential, as the demolition of Furtherwick Park school to facilitate the relocation of Castleview School reduced this from 3 to 2. Has the bus and train routes been considered as with this number of additional residents commuter routes will become overcrowded and potentially unusable? This list is by no means exhaustive but a mere example of some of the issues that will require to be considered before approving the proposed plan.</p>						<p>urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Canvey: Concern over traffic impacts, public transport, healthcare and education.</p>	<p>have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p> <p>Emergency Planning Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE.</p> <p>Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).</p> <p>Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey,</p>	

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																		<p>assessing impacts and recommending interventions.</p> <p>The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan.</p> <p>Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p>	
02550001	Individual	Scott	Spinks		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally complia	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		<p>The draft local plan is not justified and consistent with national policy.</p> <p>It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>The draft local plan is not justified. The selection strategy is</p>	<p>Green Belt/Grey belt covered under policy GB2.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Flooding : Flood risk covered in policies and the supporting Strategic Flood Risk</p>	N

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								nt. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation	Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. North-West Thundersley North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out	

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																	procedures. Add NW Thundersley.	the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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02560001	Individual	Chris	Mener		Not Stated	SP3	Not Stated	I strongly reject any type of building and planning on the Hadleigh Salvation Army Field: GB8, Site name: Land south of Hadleigh 64 Ha of agricultural fields adjoining all the southern edge of Hadleigh urban area. The capacity of the local infrastructure is already at breaking point, particularly Monday to Friday during the hours of people going to	Not Stated	Not Stated	Dear Castlepoint Planning Please find attached my letter and views on the development of GB8 Hadleigh Salvation Army Green Belt fields. Regards Chris		Not Stated		Yes, appendix 1 is a photo of a map of Hadleigh Farml and with a red box around the remains of the Roman Fort		Objects to any type of building and planning on the Hadleigh Salvation Army Field: GB8. The capacity of the local infrastructure is already at breaking point, particularly Monday to Friday during the hours of people going to work and the school runs, and, on the weekends, it can be absolute grid lock from Morrisons down to Hadleigh / Leigh on Sea boarder, which can take 10 minutes to travel 2 miles. The constraints on the Hadleigh – London Road would only compound with more houses with the development. Local roads already suffer from congestion at key junctions, which means that they may be unable to accommodate the additional traffic demands arising from	Comments noted	N

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								work and the school runs, and, on the weekends, it can be absolute grid lock from Morrison's down to Hadleigh / Leigh on Seaboard, which can take 10 minutes to travel 2 miles. The constraints on the Hadleigh – London Road would only compound with more houses with the development. Local roads already suffer from congesti									significant new housing growth. Key points from your objection include: 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the local community,		

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								on at key junctions, which means that they may be unable to accommodate the additional traffic demands arising from significant new housing growth. Key points from your objection include: 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place									selling parcels of land for large housing developments does not serve the community - period. 5. GB8 Development would severely overload local roads and infrastructure. 6. GB8 Development would create unacceptable strain on the London Road at peak times and weekends. 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! 8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options 9. GB8 will not be affordable housing, the land will be sold as a premium, the "builders" will build high-		

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								of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. 3. GB8 has the buried remains of a Roman fort, Heritage Category : Scheduled Monument See appendix 1 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be									end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would have considerable impact on the existing local service and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration, then there is absolutely no reason or rational for the council to choose GB8. If I was to support any development of		

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								keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the local community, selling parcels of land for large housing developments does not serve the community - period. 5. GB8 Development would severely overload local roads and infrastructure. 6. GB8 Development would create unacceptable strain on									the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of "plotlands" north of the Benfleet urban area on the junction of A127/ A130/ A1245. The Council could aim to achieve the amount of housing set out in the Government's standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered"		

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								<p>the London Road at peak times and weekends.</p> <p>7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha!</p> <p>8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options</p> <p>9. GB8 will not be</p>										<p>GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the "builders" to contribute to new services and school, etc...</p> <p>If the site delivered 3,373 homes with an average selling price of £400,000 that's £1.3 billion pounds of sales.</p> <p>TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout.</p> <p>THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout.</p> <p>In summary:</p>		

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								affordable housing, the land will be sold as a premium, the "builders" will build high-end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would have considerable impact on the existing local service and									My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure and community needs.		

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								schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration, then there is absolutely no reason or rational for the council to choose GB8. If I was to											

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								support any development of the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of "plotlands" north of the Benfleet urban area on the junction of A127/ A130/ A1245. There are existing low density industrial units and											

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								homes within this area. WHY: Development of the GB16 (160Ha) site in Northwest Thunder sley should be the council's strategic option for housing development. Here's a breakdown of the key points and rationale : 1. Minimal Impact on Local Services and Infrastructure: o Developing the GB16 site would											

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								<p>have limited impact on local roads, high streets, schools (both primary and secondary), children's nurseries, and medical services (doctors /dentists). Due to the site's location, it is not in an area of high congestion or near densely populated community centres.</p> <p>2. Proximity to Major Roads (A13 and A127): o Easy access to major</p>												

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								roads such as the A13 and A127 is highlighted as a key advantage. These routes would provide convenient transportation links for new residents, reducing strain on smaller local roads and possibly avoiding further traffic congestion in Hadleigh town centre. 3. Government Housing Targets: o The GB16 site, with its 160 hectares											

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								of land, would help meet the government's housing targets for new builds. 4. Large Plot of Land: o The GB16 plot is larger than what is potentially required, as the council has indicated a need for 120 hectares . This surplus of space could provide additional opportunities for developers to include community benefits such as green spaces,											

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								infrastructure improvements, or other amenities. 5. Opportunity for Large Developers: o Major property developers like Redrow, Taylor Wimpey, Barratt, Bellway, Persimmon, are likely candidates for this project. Given their significant profits, it is argued they should reinvest in the community, potentially funding new schools, parks,											

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								and other facilities as part of the development. 6. Green Belt Consideration: o While green belt land is generally protected, the argument acknowledges that if green belt development is necessary, GB16 offers a suitable option due to its size and potential benefits to the area. 7. Win-Win: o The case that the GB16 site												

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								could be developed responsibly, with minimal negative impact on existing local infrastructure and services, while also providing an opportunity for developers to contribute to community improvements makes for a good argument. This could be a win-win for both the council in meeting its housing obligations and for the develop											

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								ers in building large-scale projects. Reference consultation document. Quote: "issues-and-options-consultation-document-final-web-version" Page 52; Option 3 – Release significant Green Belt land to meet standard methodology housing need "The Council could aim to achieve the amount of housing set out in the Government's											

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								standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to											

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								be delivered” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £400,000 that’s £1.3 billion pounds of sales. To award such a large housing develop											

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								ment to a national British housebuilder, the council would have some negotiating "power" to get some significant contribution from the builder to spend on the community. GB16 could actual be development like the "Beaulieu" neighbourhood in Chelmsford, off White Hart Lane / A1016. Every time I travel to Stanstea											

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								<p>d this estate development always impresses me!</p> <p>TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout.</p> <p>THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western</p>												

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								edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout. In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality											

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								of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure and community needs.											

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0257-0001	Individual	Hayley	Mener		Not Stated	SP3	Not Stated	I strongly object any type of building and planning on the Salvation Army Field: GB8 and any of the other sites in Hadleigh . The capacity of the local infrastructure is already at breaking point. Monday to Friday during the hours of people going to work and the school runs and, on the weekends, it can be absolute grid lock from Morrisons down	Not Stated	Not Stated			Not Stated		No	A	Objects to any type of building and planning on the Hadleigh Salvation Army Field: GB8. The capacity of the local infrastructure is already at breaking point, particularly Monday to Friday during the hours of people going to work and the school runs, and, on the weekends, it can be absolute grid lock from Morrisons down to Hadleigh / Leigh on Sea boarder, which can take 10 minutes to travel 2 miles. The constraints on the Hadleigh – London Road would only compound with more houses with the development. Local roads already suffer from congestion at key junctions, which means that they may be unable to accommodate the additional traffic demands arising from	Comments noted	N

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								to Hadleigh / Leigh on Sea. The constraints on the Hadleigh – London Road would only compound with more houses with the developments proposed. Local roads already suffer from congestion at key junctions, so would be impossible to accommodate the additional traffic demands arising from 2500 new houses. Key points for									significant new housing growth. Key points from your objection include: 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the local community,		

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								<p>objection include:</p> <ul style="list-style-type: none"> * 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. * 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. * 3. GB8 has the buried remains of a Roman fort, 										<p>selling parcels of land for large housing developments does not serve the community - period.</p> <p>5. GB8 Development would severely overload local roads and infrastructure.</p> <p>6. GB8 Development would create unacceptable strain on the London Road at peak times and weekends.</p> <p>7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha!</p> <p>8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options</p> <p>9. GB8 will not be affordable housing, the land will be sold as a premium, the "builders" will build high-</p>		

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								Heritage Category : Scheduled Monument See appendix 1 * 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt. The Salvation Army acquired the land to serve the local community, selling parcels of land for large housing developments would destroy the									end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would have considerable impact on the existing local service and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration, then there is absolutely no reason or rational for the council to choose GB8. If I was to support any development of		

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								natural beauty that the community enjoys and the wildlife habitat. * 5. GB8 Development would severely overload local roads and infrastructure. The roads are already full of pot holes which would only get worse, the council can't keep up with repairs as it is. * 6. GB8 Development would create unacceptable									the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of "plotlands" north of the Benfleet urban area on the junction of A127/ A130/ A1245. The Council could aim to achieve the amount of housing set out in the Government's standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered"		

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								strain on the small residential roads & London Road especially at peak times and weekends causing stress in the community. * 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! * 8. GB8 The development just doesn't make any common sense to the current demand									GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the "builders" to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £400,000 that's £1.3 billion pounds of sales. TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout. In summary:		

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								on the area. Castlepoint have better and more suitable options such as GB16 which has the benefit of A127 & isn't disrupting anyone * 9. I doubt GB8 will offer affordable housing, the "builders" will likely build high-end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder										My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure and community needs.		

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								and will not be sold off cheap. You know this! * 10. GB8 development would have considerable impact on the existing local services, dentists, doctors and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School & Wrstwood are already at full capacity . Doctors and dentist clinics that are already over											

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								<p>subscribed and not taking on any new patients and the waiting times for an EMERGENCY appointment is currently 6 weeks at the dentist! If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. Development of the GB16 (160Ha) site in Northwest Thunder</p>											

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								<p>sley should be the council's obvious option for housing development. Here's a breakdown of the key points and rationale :</p> <ul style="list-style-type: none"> * 1. Minimal Impact on Local Services and Infrastructure: o o Developing the GB16 site would have limited impact on local roads, high streets, schools (both primary and secondary), children' 													

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								<p>s nurseries, and medical services (doctors /dentists). Due to the site's location, it is not in an area of high congestion or near densely populated community centres so services would be more widely spread.</p> <p>* 2. Proximity to Major Roads (A13 and A127): o o Easy access to major roads such as the A13 and A127 is highlighted as a key</p>											

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								<p>advantage. These routes would provide convenient transportation links for new residents, reducing strain on smaller local roads and possibly avoiding further traffic congestion in Hadleigh town centre.</p> <p>* 3. Government Housing Targets: o oThe GB16 site, with its 160 hectares of land, would help meet the government's housing targets</p>												

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								for new builds. * 4. Large Plot of Land: o o The GB16 plot is larger than what is potentially required, as the council has indicated a need for 120 hectares . This surplus of space could provide additional opportunities for developers to include community benefits such as green spaces, infrastructure improvements, or other amenities such											

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								as its own health centre. * 5. Opportunity for Large Developers: o o Major property developers like Redrow, Taylor Wimpey, Barratt, Bellway, Persimmon, are likely candidates for this project. Given their significant profits, it is argued they should reinvest in the community, potentially funding new schools, parks, and other facilities											

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								as part of the development. * 6. Green Belt Consideration: o o While green belt land is generally protected, the argument acknowledges that if green belt development is necessary, GB16 offers a suitable option due to its size and potential benefits to the area. * 7. Win-Win: o o The case that the GB16 site could be develop											

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								ed responsibly, with minimal negative impact on existing local infrastructure and services, while also providing an opportunity for developers to contribute to community improvements makes for a good argument. This could be a win-win for both the council in meeting its housing obligations and for the developers in building											

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								large-scale projects. Reference consultation document. Quote: "issues-and-options-consultation-document-final-web-version" Page 52; Option 3 – Release significant Green Belt land to meet standard methodology housing need "The Council could aim to achieve the amount of housing set out in the Government's standard methodo											

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								logy (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered											

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								d” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £300,000 that’s £1 billion pounds of sales. ONE: GB16 Northwest of Thundersley 160 Ha											

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								collection of "plotlands" north of the Benfleet urban area on the junction of A127/ A130/ A1245. There are existing low density industrial units and homes within this area. TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundab											

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								out. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale											

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								development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure and community needs.											

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02590001	Individual	Zoe	Loveday		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has not credible five-year housing land supply.	No	Justified, Consistent with National Policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No	Not Stated	No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and	N

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											operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.	have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
0260001	Individual	Natalie	Osborne		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the	No	Justified, Consistent with National Policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not	Add North West Thundersley site	Not Stated	Not Stated	No	A	Fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new	North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy	N

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								Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the						NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SP3 option 4) outlines why North West Thundersley was not preferred. Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. Green Belt/Grey belt covered under policy GB2. Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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											estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.								
0261001	Individual	Dawn	Bennett		Not Stated	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey for two years but it is quite obvious that is unable	No		Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls	Not Stated	Not Stated	No	A	<p>Objections on:</p> <ul style="list-style-type: none"> • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a 	<ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – 	<p>Y - Policy SD3(3)</p> <p>3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).</p>

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								to sustain any additional building with the current infrastructure. Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the			considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan	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.				full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. Comments noted.		

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								needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the			unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly									

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								pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh			unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far										

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								Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green			more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood									

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								Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North			resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-									

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								West Thunder sley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a			year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide									

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								way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the			to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing									

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								Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is			trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own									

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								far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastru			infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where										

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								<p>cture strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects</p>			<p>exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted.</p>									

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								strong community engagement. * North West Thunder sley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply,			Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF,											

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								December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a											

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								deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower											

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								assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while											

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								the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academi											

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								concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											

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0262001	Individual	John	Bennett		Not Stated	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey for two years but it is quite obvious that is unable to sustain any additional building with the current infrastructure.	No		Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated	Not Stated	No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations.			around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be	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.					should have been included.	evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. Comments noted.	

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								Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute			directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically										

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								on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highway access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the				discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion									

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								Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They			is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and									

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								must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl			Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of									

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								Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better			speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a									

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								protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the			sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a									

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								consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include			strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no									

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								greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The propose			formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The										

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								d allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a			site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan,											

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								sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of			some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.									

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								the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparin												

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								g the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragrap											

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								h 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only											

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								weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft											

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								plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is											

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								sustainable, justified, and in the public interest.											
02640001	Individual	Carole	Ferguson		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I	No	Justified, consistent with National Policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes.	No	Not Stated	No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape

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								consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate	Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.					"over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.	reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to	character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. The access roads onto Canvey Island are not sufficient at the present time. A further road(s) must be a priority in order to even consider further housing on the Island. Most of the roads around the Island are also not standard width which causes problems navigating the area. Consideration as to how the Island's roads would cope with the copious amount of building traffic that would need to access the Island would need to be a further priority.									provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
0267001	Individual	Amy	Dawson		Not Stated	SP3	No	To Whom It May Concern , I wish to express my objection to the Castle Point Plan Regulation 19 Draft, which I believe is non-compliant due to its failure to	Not Stated	Not Stated	This raises serious concerns about the risk of speculative development on protected greenbelt areas, which are vital for preserving local ecology and biodiversity. The plan disproportionately targets Canvey Island for development, despite significant infrastructure constraints. Overdevelopment in this area will exacerbate issues related to highways, traffic, drainage, sewage, and flood risk.	I urge the Council to consider more balanced alternatives, such as North West Thundersley, which could meet housing needs without placing undue pressure on urban and environmentally sensitive areas. Please take into account the limited conservation and green spaces remaining on Canvey Island, and the long-term impact this plan may have on	No	Not Stated	No	A	* Fails to consider all alternative locations for housing development. * Disregards the updated National Planning Policy Framework (NPPF) guidance on greenbelt and grey belt land. * The plan disproportionately targets Canvey Island for development, despite significant infrastructure constraints.	Consideration of All Sites: All reasonable options were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Green Belt/Grey belt covered under policy GB2. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to		

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								adequately consider alternative, potentially more strategic, locations for housing development. The proposed site selection appears to disregard the updated National Planning Policy Framework (NPPF) guidance on greenbelt and grey belt land.				infrastructure and wildlife.					Overdevelopment in this area will exacerbate issues related to highways, traffic, drainage, sewage, and flood risk. * Urges Council to consider North West Thundersley, which could meet housing needs without placing undue pressure on urban and environmentally sensitive area * Please take into account the limited conservation and green spaces remaining on Canvey Island, and the long-term impact this plan may have on infrastructure and wildlife.	North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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0330001	Organisation	Michael	Murrell	Basildon Council		SP3	No	1.1 Basildon Borough Council is a neighbouring local planning authority (LPA) to Castle Point and there are a number of strategic issues, such as housing and infrastructure, which have cross-boundary impacts over a number of local authority areas. It is important that such issues are addressed through collaborative	No	Positively Prepared, Justified, Consistent with National Policy, Effective	1.5 Basildon Borough Council does not believe that the Castle Point Local Plan 2026-2043 meets the tests of soundness in all of its policy areas. Positively Prepared 1.6 Castle Point Draft Local Plan does not make adequate housing provision using the Standard Method and therefore is a failure to meet the housing need of the area. The housing provision set out in Policy SP3 delivering a minimum of 6,196 new homes over the plan period (2026-2043) accounts to 53% of the requirement set out by the Standard method, which accounts for an unmet need of 5,466 homes. 1.7 Following the publication of the new NPPF (December 2024) Basildon Council is also required to accommodate an increased level of growth and are unable to accommodate any unmet housing need from neighbouring or nearby local authorities, including Castle Point Council. Policy SP3 identifies a stepped housing trajectory, delivering at least 1,045 new homes in years 1 to 5, at least 1,268 new homes in years 6 to 10 and at least 3,883 new homes in years 11 to 17. The plan proposes a place-based approach to development with policy and site allocations for each of the settlement areas. The Housing Capacity Topic Paper (2025) identifies that Castle Point has capacity for 6,196 homes over the plan period, in line						B - confirm for formal response	Considers the local plan is not compliant or sound as the housing strategy does not meet the standard method housing need and considers that the LDS may need to be updated to provide more time for CPBC to gather more evidence. Queries the approach of urban renewal and regeneration with focus on protecting and enhancing the natural environment based on evidence including LNRS. Considers that the local plan could have used some Green Belt sites for development which were highlighted in the DAC study July 2025. Does not support policy as does not meet castle point's housing need under standard	CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August 2025.	N

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								working and meaningful discussions in accordance with the Duty to Cooperate, the National Planning Policy Framework (NPPF), and National Planning Practice Guidance (NPPG). 1.2 It is understood that the main purpose of the consultation document is to ensure that Castle Point's Local Plan is legally compliant and meets the tests of			with Policy SP3 in the Plan. Justified 1.12 The urban renewal and regeneration approach with a focus on protecting and enhancing the natural environment has regard to national policies and regional strategies such as the Essex Local Nature Recovery Strategy (LNRS) justified through an extensive evidence base. However, Basildon Borough Council questions whether the approach was the most appropriate considering the failure to meet the standard method. 1.13 The Green Belt Assessment (July 2025) produced by DAC Planning concludes significant recommendations which the Plan has not taken into consideration. The assessment suggests that the Council could alter the Green Belt boundary in 16 locations, there are 12 sub-areas that are recommended for further consideration for plan-making and 19 out of 31 sub-areas assessed as constitute potential Grey Belt land. Policy GB2 states that the redevelopment of previously developed land in the Green Belt will not constitute inappropriate development when the site is in an area identified as Grey Belt. The Plan could have made provision for housing in the green belt areas as identified by DAC Planning and 34 Green Belt sites assessed in the Strategic Land Availability						methodology. Recognises that Policy SP3 exceeds the local need for based on CP's Local Housing Needs Assessment 2023 . Recognises the constraints particular to Castle Point, but plan fails to identify reasonable alternatives to address the unmet housing need. Basildon states it is unable to meet any of Castle Point's Un-met housing need. Queries why grey belt sites identified by the Green Belt Assessment July 2025 were not taken forward in order to meet the Standard Method Housing Need.	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	This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including environmental and heritage designations, flood risk, highways issues which	

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								soundness. Please be advised that for all of the consultation points below, the Council would like to attend the future oral hearings as part of the Plan's Examination in Public. Q. Do you consider the Castle Point Plan Draft document to be legally compliant? 1.3 Basildon Borough Council does not believe that the Castle			Assessment (SLAA 2025) in order to meet the standard method figure for housing supply. Consistent with National Policy 1.14 Castle Point's Local Housing Needs Assessment 2023 identifies the Council's objectively assessed housing need to be 255 dwellings per annum or 5,100 dwellings over 2023-2043. Overall, the Plan seeks to provide for a minimum of 6,196 homes over the plan period at an annual average of 354 new homes per annum. Whilst Policy SP3 provides for the local need for housing as per the evidence base assessment, the plan deviates from the national Standard Method. The current Standard Method (November 2024 NPPF) for Castle Point is 686 new dwellings per annum, equating to 11,662 over the Plan period. 1.15 Paragraph 6.58 states the exceptional circumstances as justification for failure to meet the Government housing targets as set out by the revised Standard Method. Whilst, Basildon Council understands the constraints particular to Castle Point, the plan is not consistent with national policy and fails to identify reasonable alternatives to address the unmet housing need.							impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Castle Point's approach to the site review is outlined in The Housing Capacity Topic Paper August 2025. Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery. Any potential grey belt sites identified within the Green Belt Assessment	

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								Point Local Plan 2026-2043 is compliant with necessary legislation. The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method for assessing local housing need. The standard method identifies a minimum annual housing need figure and ensures that plan-making										July 2025, were reviewed. However, none were considered suitable for development as outlined in the Housing Capacity Topic Paper August 2025. Within the NPPF Paragraph 11 section b (i) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. This includes situations where: <ul style="list-style-type: none"> • the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7 ; or • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. 	

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								is informed by an unconstrained assessment of the number of homes needed in an area (PPG Paragraph: 002 Reference ID: 2a-002-20241212). Whilst Basildon Borough Council fully appreciates the scale of the challenge and complexity of planning for housing, the alternative approach to calculating housing need is										Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding. Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that "Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations..." The NPPF footnotes set out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas)."	

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								not compliant with relevant legislation. 1.4 The revised Local Development Scheme (LDS, July 2025) identifies two months from publication of Regulation 19 to submission. The Council may need to revise the timetable to allow consultants to finalise outstanding commissioned assessments and for review of consultation responses											

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								es, which may require additional work to be carried out.											
02790001	Individual	Jane	Dexter		Not Stated	SP3	Yes	Dear Cllr Dave Blackwell, I am a resident of Castle Point and fully support the Plan's proposal to preserve our	Yes				Not Stated		No	A	Fully support the Plan's proposal to preserve our Green belt. I agree that new homes should be built on brownfield site's within the borough and the relevant infrastructure improvements should be made to support the increase in	Support noted.	N

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								Green belt. I agree that new homes should be built on brownfield site's within the borough and the relevant infrastructure improvements should be made to support the increase in traffic/population. Kind regards, Jane Dexter Sent from my iPhone									traffic/population.		

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0281-0001	Individual	DP	Mahoney		Not Stated	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Having lived on the Island since 1969, I have always enjoyed Island life. Indeed I felt this was a wonderful, safe place for my Children to grow up, enjoying similar places that I did as a child. The Splash park has fallen into disrepair and we were unable to use it. The Seafront was very rundown and is now crammed on my occasions, so much so, that I haven't visited the Seafront or Sea walkways for over 10 years	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											<p>now, despite it being one road away. The Island is very unkempt at times, our bins being collected fortnightly (pink one week, black the next) our Police Station is part time (no front desk, walk in available). A family member was involved in a car accident, it took too long for an ambulance and police to attend, which put that person's life in danger. Our Ambulance station in Sydervelt was closed a long time ago. We should always have an ambulance based at the Charfleets Ambulance Service Facility. We have no A&E, often having to travel to Orsett, Basildon or Southend, which is concerning and could be alleviated by having a Triage based at the Paddocks Medical Centre. Many people would not then require the travel over to the other places. Traffic is now reaching gridlock. It takes people ages to leave and return for and after a full working day. People now spill out from Benfleet station while waiting for Bus services, many buses standing room only. If you wish to visit Lakeside, or have a hospital appointment, it takes ages to even leave Canvey Way to join any major road, a funeral can cause major delays (and this isn't fair on the Mourners themselves either). I'm at a loss to understand why people wish to cram and cram too many people onto a cul-de-sac Island, removing the</p>						development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. Concerned about lack of ambulance station or A&E on Canvey and traffic gridlock. The shops are limited, the entertainment is limited, services and companies limited, schools, dentists and GP surgeries bursting and	respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). Infrastructure Infrastructure matters (including health related) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Highways Impacts: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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											<p>only area with large working facilities (Charfleets). Forcing many long running and several Generations owned business' out of work and facing closure. The shops are limited, the entertainment is limited, services and companies limited, schools, dentists and GP surgeries bursting and unable to cope. It's not unusual to find a 6/8 week wait to see anyone urgently for care and health worries. It's now a misery already to reside here, it's so cramped. Please use common sense and find other areas around the District to place new homes. Please stop putting lives at risk, in the event of a Gas problem at the Oikos Centre, Floods or indeed just as worrying, from Planes that fly directly over the Island at a growing rate, due to the concerns over the dangerous ship in the Thames Estuary at Shoebury. There should be no further building. Canvey Island is beyond full. Canvey Way needs to be a dual carriageway urgently for safety reasons (should there be a need to evacuate, that's 4 lanes to go off the Island). I have Children and Grandchildren who cannot afford or indeed find properties available to be near me as I grow older. I myself had this issue 30 years ago, having to buy my first home off the Island, but return daily several times before and after work to care for my own</p>						unable to cope. There should be no further building. Canvey Island is beyond full. Canvey Way needs to be a dual carriageway urgently for safety reasons (should there be a need to evacuate, that's 4 lanes to go off the Island). I have Children and Grandchildren who cannot afford or indeed find properties available to be near me as I grow older. I myself had this issue 30 years ago, having to buy my first home off the Island, but return daily several times before and after work to care for my own Elderly Parents,		

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											Elderly Parents, before being able to return to the Island and buy a home able to cope with three generations, which I have owned for over 24 years. The Council homes system is also broken, many people from all over Kent, London and beyond are being permitted to take over the properties on the Island, with no connection to it. While people with Disabilities, DV situations and Bereaved who have local family networks that would help and support them, are forced away from the Island to Southend or Basildon and beyond. This is ridiculous too. You are crushing the very essence of this Island, the Sealife surrounding it and it often Floods internally because the roads and structures cannot cope with anything as it is, without adding many more homes and families to it. Already changing the Thorney Bay camp into a home area, causes additional traffic and dangerous junctions, on a School route. The Island is filled to capacity, bursting at the seams and the quality of life and health is reducing monthly.						before being able to return to the Island and buy a home able to cope with three generations, which I have owned for over 24 years. The Council homes system is also broken, many people from all over Kent, London and beyond are being permitted to take over the properties on the Island, with no connection to it. While people with Disabilities, DV situations and Bereaved who have local family networks that would help and support them, are forced away from the Island to Southend or Basildon and beyond. This		

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																	is ridiculous too. You are crushing the very essence of this Island, the Sealife surrounding it and it often Floods internally because the roads and structures cannot cope with anything as it is, without adding many more homes and families to it. Already changing the Thorney Bay camp into a home area, causes additional traffic and dangerous junctions, on a School route. The Island is filled to capacity, bursting at the seams and the quality of life and health is		

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0765-0001	Individual	jaqueline	haste	betafit kitchens	Yes	SP3	No	FAILED TO CONSIDER STRATEGIC ALTERNATIVES LIKE NORTH WEST THUNDERSLEY. NO CREDIBLE 5 YEAR HOUSING SUPPLY	No	Justified, Consistent with national policy	The draft local plan is not justified with national policy. Doesn't meet the housing target for castle point. Site selections ignore Greenbelt/Grey belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt built policy" Site selection is based on the overdevelopment of Brownfield sites. Not all sites considered, No Greenbelt/grey belt sites added and with the exclusion of North west Thundersley. NPPF guidelines state development should be directed away from area's at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 Urban homes for Canvey is not resident led. Canvey West homes puts residents in the East of Canvey at risk with emergency evacuation procedures.	ADD North west Thundersley site. 187Ha A greenbelt Grey belt Brownfield site option for 7500 homes Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 Total housing target of 11000 homes	No	Not Answered	Not Answered	A	Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore 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	N

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																		<p>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.</p> <p>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</p>	

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																		<p>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. Green Belt/Grey belt is addressed under policy GB2.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic</p>	

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																		<p>Paper, it was not included within the plan.</p> <p>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.</p> <p>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,</p>	

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

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0284002	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	SP3	No	Policy SP3: As above, BBC is not supportive of the CPLP housing strategy as this does not commit to meeting the Borough's identified standard method housing need requirement in full within the CPBC administrative boundary. Limited information is provided regarding the justification for the dismissal of alternative	No				Not Stated		No	A	Considers the local plan is not legally compliant or sound as housing strategy does not meet all of the housing need calculated by the standard methodology Acknowledges CP's physical and environmental constraints. Considers that there is limited technical evidence to justify lower housing delivery and no full transparent assessment of alternative spatial strategies including one that would meet the full standard methodology housing need. Suggest that further evidence and testing required – propose the cumulative impact on transport	CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August	N

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								spatial strategy options that might have enabled CPBC to meet its full housing need and, no approach is outlined for addressing the unmet need. As such, BBC finds Policy SP3 to not be legally compliant or sound. BBC however has no specific concerns to raise over the soundness of the sites proposed for allocation in this strategy.										<p>2025. Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period.</p> <p>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.</p> <p>CPBC notes that Brentwood is unlikely to be able to assist CPBC in meeting its unmet housing need.</p> <p>CPBC has followed the EPOA protocol for considering unmet housing need and has requested assistance from all its neighbouring authorities. No authority was able to assist.</p>	

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																		<p>CPBC transport assessment provided high level modelling of the impact of growth on key highway junctions. Further transport assessments will be carried out as housing allocations come forward during the local plan period.</p> <p>BBC and the other South Essex Local Authorities are currently preparing their local plans and developing their housing strategies to accommodate the expected significant growth across South Essex. As these local plans come forward, their transport assessments will add to the evidence and provide greater granular detail of the impact of this cumulative growth on the transport network.</p> <p>CPBC welcomes collaboration with neighbouring authorities on their transport assessments as</p>	

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																		they finalise their housing strategies following the revised December NPPF 2024. CPBC also proactively engages with ECC LTP4 work which provides evidence for transport infrastructure for all of Essex	

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1420001	Agent	John	Ferguson	Collective Planning	Yes	SP3	No	Introduction BlueSquare Homes Ltd represents Thunderley Investments Ltd and owners of the site located to the south of The Chase, Thunderley. The company unifies the owners into a consortium to promote residential development at the site. Options have been granted to BlueSquare Homes Ltd by the owners,	No		Further sub area assessment of GB12 in the appendices again confirms weak contributions of the site to purposes a and c of the Green Belt and no contribution to purpose b. The conclusion states, "If the sub-area were released it would be unlikely to significantly harm the performance of the wider Green Belt due to its self-contained nature within the built-up area of Thundersley and reflecting its isolation from the wider Green Belt." The same site was also tested at the previous Local Plan examination. In this instance the Inspector concluded at para 106, "Given the need for housing which cannot be accommodated within the existing urban area and the limited harm to the Green Belt, I find that there are exceptional circumstances for removing this site from the Green Belt." This is therefore one example of a recognised poor performing Green Belt site that the Local Authority has chosen to not release from the Green Belt for housing. This demonstrates that the housing target is flawed as they are unprepared to utilise Green Belt sites (that do not meet the purposes of the Green Belt) to meet the housing need. The housing number and the position on not releasing further Green Belt sites for redevelopment is therefore unsound and an 'exceptional' departure from the standard housing target is	Site GB12 should be a site that is removed from the Green Belt for the reasons set out above, to ensure it can make an optimum contribution to meeting housing need, and the current approach of the Local Plan to adopt a lower housing target when there are developable sites that could be used for housing is unsound.			Yes, Site Boundary and Report to Castle Point Borough Council by Philip Lewis BA(Hons) MA MRTPI an Inspector appointed by the Secretary of State		Site GB12 should be a site that is removed from the Green Belt for the reasons set out above, to ensure it can make an optimum contribution to meeting housing need, and the current approach of the Local Plan to adopt a lower housing target when there are developable sites that could be used for housing is unsound.	Noted	N

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								who empower them to speak on behalf of all those owners. A site location plan showing the land our client owns is attached at Appendix 1. Our client is in the process of bringing forward a residential led scheme through the planning process, and has engaged with planning officers through a pre-application process over the past 5 years. The site			unjustified. Site GB12 Contribution to Housing Green Belt matters in relation to housing targets are addressed above. Site GB12 is used as an example of a recognised poorly performing Green Belt site meeting the exceptions test for release from the Green Belt. However, aside from Green Belt considerations, this site is considered within the SHLAA as being viable and developable, and therefore must be considered as a viable option for housing. The SHLAA confirms the site's suitability for development against all criteria except for local wildlife site 'unknown'; contaminated land 'unknown' and public open space 'unknown'. These matters can all be addressed through a planning application scheme. This site is particularly well suited to housing as recognised by the SHLAA, but also for the following reasons: - Limited Contribution to Wider Green Belt The site is surrounded by built development on all 4 sides. This comprises housing to the south, east and north, and various uses including civic, leisure and education to the west. Therefore, the site is already largely enclosed by existing development and impact of this site being developed on the openness of the green belt is very limited -									

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								<p>previously formed part of a site allocation for new housing in the previous (now withdrawn) Local Plan, that was found sound by an Inspector (Inspector's Report at Appendix 2). Approach to Housing Provision The Regulation 19 Consultation refers to the standard housing methodology target of 11,662 new homes</p>			<p>Sustainable Location The site is located in a sustainable, accessible location in Thundersley. Benfleet railway station is approximately 2.7km to the southwest with services to London Fenchurch Street, Southend Central, Shoeburyness and Leigh On Sea. There are bus stops along Kiln Road, the closest being the Warren Chase bus stops, which have services operating towards Benfleet railway station, Rayleigh, Basildon Town Centre, Canvey, Southend-on-Sea and North Shoeburyness. The site is in close proximity to a number of local shops, services and amenities, particularly immediately to the west of the site where Castle Point Borough Council, Runnymede Leisure Centre Runnymede Hall and USP College are located.</p> <p>- Public Benefits Alongside the potential for the site to deliver new housing and affordable housing, the site also has the ability to improve public access and improved permeability through the site. Currently the site is privately owned and whilst there are informal routes through the site that neighbouring residents sometimes use, there is an ability of a new development to provide public access through the site linking east to west and north to south. This will benefit residents of the</p>											

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								over the plan period or 686 dwellings per annum. However, the Regulation 19 Consultation sets an alternative housing target of 6,196 new homes. There are a number of reasons given for this reduced target including the historical low rate of delivery, Green Belt restrictions, and infrastructure constraints. The housing target of 6,196			surrounding area, improving access to the leisure, civic and education uses to the west. As well as public footpaths the scheme can also provide cycle routes through the site. Any new scheme will also deliver new public open space that will significantly benefit the wider area. - Protection of Higher Quality Green Belt The site is in a sustainable location, surrounded by development. It is therefore considered a less sensitive site than other green belt sites in the district. Allowing this site to come forward for housing will ensure protection of the more sensitive, less accessible green belt sites in the district.										

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								(almost half the required target under the housing standard methodology), is fundamentally flawed. As set out in the NPPF, the Government's objective is to significantly boost the supply of homes, with the overall aim to meet an area's identified housing need. The fact that the Local Authority has Green Belt land is not a legitimate reason											

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								to arrive at such a reduced housing target. This position also contradicts a previously held position the Local Authority took on the release of Green Belt land for housing under the previous Local Plan (that was found sound by the Inspector (2023), but not adopted by the Local Authority). In this instance the Inspector (at paragraph 45 of											

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								the report) stated 'there are strategic level exceptional circumstances to alter the Green Belt boundary to meet housing needs in the interests of the proper long-term planning of the Borough'. The reasoning included : The need for housing; and The supply and availability of land suitable for sustainable											

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								development. This plan proposed the release of a number of Green Belt sites for housing. It should be noted this was under a more restrictive NPPF position on Green Belt release, that has since changed and made provision for exceptional circumstances for a review of Green Belt boundaries. The NPPF is clear that exceptional circumst												

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								ances include instances where a Local Authority cannot meet its identified need for homes through other means. It is therefore considered that exceptional circumstances apply here to review Green Belt boundaries. The Local Authority will claim the Green Belt review provides evidence that reviewing the Green Belt boundari											

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								es would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan, however the Green Belt Assessment confirms areas of Green Belt that are considered to make no or limited contribution to the purposes of the Green Belt. The Assessment considers site GB12											

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								The Chase. Figure 14 from the Assessment shows this site makes a 'weak' performance against the purposes of the Green Belt overall and Table 12, figure 16 and figure 18 states the site could be considered grey belt upon consideration of Green Belt purposes a and b.											

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10970001	Agent	.	.	Cove UK c/o Laister Planning Limited	Yes	SP3	No	Please see Supporting Statement	No	Positively prepared, Effective, Justified, Consistent with national policy	See supporting statement for full site justification and proposal. 1.1 This Local Plan Representation submission has been prepared in relation to land east of Kings Park Village (the site), on land owned by Castle Point Borough Council. Kings Park Village (KPV) itself is owned by Cove UK. 1.2 The Local Planning Authority (LPA, or Council) in relation to this representation and therefore the site is Castle Point Borough Council (CPBC). 1.5 This submission seeks to identify the site as a suitable site that should be removed from the Green Belt, being 'Grey Belt' land (as defined in the NPPF), and subsequently allocated for residential purposes in the forthcoming Castle Point Local Plan for around 50 residential static caravans/park home pitches (falling within the definition of caravans found in the Caravan Sites and Control of Development Act 1960 (the 1960 Act) for permanent residential occupation by older or elderly persons, without care (i.e. independent living). 1.6 The remainder of this representation sets out the background of the site, its current use, policy context, and the reasons why the site is suitable for residential development, having regard to the national and local guidance and finally whether	Please remove land east of Kings Park Village from the Green Belt and allocate it for up to 50 residential park homes	Yes	Not Answered	Yes	C	Green/Grey Belt Not meeting housing numbers	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point 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	N

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											<p>the site is deliverable having regard to guidance in the Planning Practice Guidance (PPG).</p> <p>8.1 Laister Planning Limited has been instructed by Cove UK, to submit a representation to Castle Point Borough Council for the development of Land East of Kings Park Village (currently adjacent to Canvey Heights Country Park).</p> <p>8.2 The proposal for this site would provide a park home (static caravan) development for elderly persons by extending the existing caravan park known as King's Park Village.</p> <p>8.3 The site is located on the edge of Canvey Island which is classified as a large settlement within the borough of Castle Point, providing a good range of goods and services. The settlement is located south of South Benfleet and Hadleigh, with good road access via the B1014 and A130, offering a wider range of services and employment opportunities.</p> <p>8.4 The Council previously concluded that the land performed poorly in Green Belt terms, and proceeded to allocate the site for caravan-based residential development in the previous 2018 Local Plan. An Inspector found that the proposed allocation was "sound", subject to minor modifications. Unfortunately that Local Plan did not proceed towards adoption. However, as set out in this</p>												<p>from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>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 greenfield sites in providing flood mitigation, Evidence of the capacity of the</p>	

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											<p>report, there are no changes to the site's characteristics or national policy that would indicate that the previous proposed allocation should not be re-iterated with this new emerging Local Plan. The site remains suitable for residential development.</p> <p>8.5 There is a clear demand for housing allocations, with the present emerging Local Plan allocating insufficient land to meet the identified needs. There is also clear guidance that the Council should be allocated sufficient land for specialist housing needs for the elderly, including homes that facilitate independent living. The land east of King's Park Village is a suitable location.</p> <p>8.6 Indeed, the site is "deliverable" within the context of the Government's guidance. That is to say that it is "suitable", "available" and "achievable". It should have been included within SLAA for residential development, to assist with the preparation of a new LP for Castle Point.</p> <p>8.7 It is suitable because the caravan site falls within the NPPF definition as a Grey Belt, following the change in government and the new designation of Grey Belt land. It is therefore desirable to use it for alternative purposes, so long as the development can be made sustainable. This report demonstrates that the proposals can comply with the NPPF and would be a form of sustainable development.</p>												<p>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.</p> <p>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.</p>	

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											<p>There are no environmental or physical constraints to the site that would prevent its use for residential purposes, and it is not presently allocated for some other use.</p> <p>8.8 The Grey Belt site would benefit from the relevant NPPF policies regarding its development, where there is a need to find land for housing.</p> <p>8.10 The site is also "achievable", as it is already adjacent to a caravan park and there are no obvious viability constraints for its use as a residential park home site. There is a growing need for the provision of homes for the elderly in the Borough, for example, which will be met in part by the use of KPV for permanent residential homes for older persons.</p> <p>8.11 In conclusion, the site proposed should be allocated as it represents a sustainable Grey Belt site that can be developed quickly and easily to assist in meeting the Council's requirements for a variety of housing options. The previous proposed allocation for the site should be reiterated in this Local Plan, to make this plan "sound". As otherwise, the Local Plan is neither justified nor consistent with national policy and should be considered "unsound".</p> <p>8.12 Laister requests that the Council deallocate the land east of King's Park Village from the Green Belt and allocate this land for housing.</p>												

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											It should also inset the former draft Policy HO31 from the								

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0790001	Individual	Debie	Purkis	Deborah Jean	Yes	SP3	No	Failed to consider strategic alternatives for example North West Thundersley. No credible 5 Year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with National Policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/Grey Belt against new NPPF guidelines. The Draft Local Plan is not justified. Site selection strategy is biased and predetermined towards a "No Greenbelt build policy". Site selection is based on the "over development of Brownfield sites " Not considered all sites, no greenbelt/grey belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. the 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Add North West Thundersley site, 187Ha, a Greenbelt/GreyBelt/Brownfield option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000	No	Not Answered	Not Answered	A	Not meeting standard method Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in 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	N

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																		<p>from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>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 should be</p>	

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																		<p>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 housing topic paper.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review,</p>	

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																		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 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	

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																		<p>policy GB2.</p> <p>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.</p> <p>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.</p> <p>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</p>	

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

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0319-0001	Agent	James	Chapman	Discovery Land and Planning		SP3	No	This representation addresses the soundness of the Castle Point Local Plan (Regulation 19). While the Council has made progress towards plan-making, the Publication Draft is unsound as it significantly under-provides for housing need, relies on unrealistic assumptions in its trajectory, overstates supply, and fails				Suggested Modification: Reassess the housing requirement, test reasonable alternatives including urban densification, estate renewal, and garden land capacity, and plan positively to close the gap.				A	Significantly under-provides for housing need, Relies on unrealistic assumptions in its trajectory, Overstates supply, and fails to make adequate provision for affordable housing. The Council has also not adequately explored reasonable alternatives such as densification, redevelopment of lowdensity estates, and managed garden land capacity. Key issues: - Housing requirement is set at 6,196 dwellings (364 dpa) compared with a local housing need of 11,662 dwellings (686 dpa), leaving a gap of 5,466 dwellings. 11-17. Many sites only deliver from 2028/29 or later. - Extant permissions are	Noted	N

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								to make adequate provision for affordable housing. The Council has also not adequately explored reasonable alternatives such as densification, redevelopment of low-density estates, and managed garden land capacity. Key issues: - Housing requirement is set at 6,196 dwellings (364 dpa) compared with a local housing									counted without any non-delivery discount (despite evidence that 10% of permissions lapse). The plan therefore fails the NPPF tests of being positively prepared, justified, effective, and consistent with national policy.		

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								<p>need of 11,662 dwellings (686 dpa), leaving a gap of 5,466 dwellings.</p> <p>- The trajectory is backloaded: 1,045 homes in years 1-5; 1,268 in years 6-10; and 3,883 in years 11-17. Many sites only deliver from 2028/29 or later.</p> <p>- Over-counting : Council includes dwellings scheduled beyond the plan period and holiday home replace</p>													

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								ments (Thorney Bay) in its supply. - Extant permissions are counted without any non-delivery discount (despite evidence that 10% of permissions lapse). - Affordable Housing: The LHNA (June 2025) identifies a need for 1,458 AH units (86 p.a.), but allocations are expected to deliver only 954, with most Affordable Housing depende											

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								<p>nt on one single site (C4) not delivering until late in the plan period.</p> <p>- Council has not properly assessed the redevelopment potential of low-density Council-owned estates or the contribution from garden/backland redevelopment. The plan therefore fails the NPPF tests of being positively prepared, justified, effective, and consistent with national</p>												

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								<p>policy. 1. Housing Requirement Shortfall Problem : The Plan sets a provision of 6,196 dwellings (364 dpa), while the standard method (Dec 2024) requires approximately 686 dpa (11,662 dwellings), leaving a shortfall of 5,466 dwellings. This under-provision is contrary to NPPF paragraph 61.</p> <p>Why Unsound : Not positively prepared, not justified,</p>												

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								not consistent with national policy.											
0319-0002	Agent	James	Chapman	Discovery Land and Planning		SP3	Not Stated	Problem : The Council adopts a stepped trajectory (1,045 / 1,268 / 3,883) which backloads delivery to later years. The SLAA shows all allocations do not start until 2028/29 or later. The Council also counts dwellings beyond the plan	No	Effective, Justified	Why Unsound: Not effective, not justified, risks failing to maintain a 5-year supply.	Suggested Modifications: - Replace stepped trajectory with a realistic annual profile based on site-specific phasing and build-out rates. - Remove from the supply any dwellings scheduled beyond the plan period. - Exclude holiday/one-for-one replacement units unless evidence proves they are permanent net additions. - Apply a non-delivery discount (10% or more) to extant permissions.			Yes	A	Key Issues - The trajectory is backloaded: 1,045 homes in years 1-5; 1,268 in years 6-10; and 3,883 in years - Over-counting: Council includes dwellings scheduled beyond the plan period and holiday home replacements (Thorney Bay) in its supply.	Noted	N

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								period (200 units each from C1 and Had1 scheduled to be delivered after the plan period are included in the 6,196 calculation) and holiday home replacements (Thorney Bay). Extant permissions are counted with no discount for non-implementation.											

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03520001	Agent	Mike	Tanouis	Dove Jeffrey Homes		SP3	No	I thought I would write to you to explain the following information regarding Castle point Council and their latest local plan will identify to you that Castle point council are an example of why the governm ent will never achieve the deputy Prime Minister Angela Rayner's target at 1.5 million homes Castle Point Borough Council' s continui	No		<p>Questions for the Government</p> <p>1. Will the Department use its intervention powers, for example by commissioning a directly-prepared plan or removing plan-making powers if an authority's Regulation 19 draft is demonstrably non-compliant?</p> <p>2. What further sanctions or incentives (financial, Housing Delivery Test penalties, or planning freedoms) does the Government envisage to realign local political incentives with national objectives?</p> <p>We would be grateful for your response to these questions and for an outline of the steps you intend to take to ensure that councils such as Castle Point cannot continue to thwart the Government's housing-delivery ambitions. It frustrates me that we finally have a government that recognises the strategic significance of housing, and then a local council like Castle Point seems to be actively undermining it. The key objective to build houses for the youth and other people of the country by having rental mortgage to pay gets people to work not sitting around I'm not sure about this not working not drinking taking drugs or committing crimes. We need you to finally push the country forward and back to where we should be in the world. If you wish to meet us and discuss all the all the issues and topics regarding Castle point and the</p>						Suggests that CPBC is directly undermining the Labour government's desire to get Britain building again. Requests government intervention	Noted	N

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								ng failure to plan for housing I am writing to seek your views on, and the Government's intended response to, the latest Regulation 19 draft Local Plan published by Castle Point Borough Council (CPBC). I strongly believe in the Labour government's housing plan, and our view is that CPBC is directly undermining the Labour government's			application and the future of the of the Castle point region we will be happy to meet with with us and members of the consortium if you need any further details, let us know or if you want to attend the sites and look at the local area which I think it would be incredibly important then that we're very happy to step up or either organise an online call or a physical meeting .								

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								desire to get Britain building again. A decades-long absence of a sound plan Castle Point has not had an adopted, up-to-date Local Plan since 1998. In December 2023, the then Secretary of State, Rt Hon Michael Gove MP, issued a formal direction , warning that the Department would intervene unless CPBC set and met a credible timetable												

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								e for submission and adoption . The Regulation 19 draft ignores the NPPF housing requirement The standard -method figure published by DLUHC in May 2025 indicates that Castle Point must plan for 686 dwellings per annum (Approx. 11,660 homes over the 17-year plan period 2026-43). By contrast, the draft plan provides for only											

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								6,196 homes, representing barely 53% of the minimum need. In other words, the Council openly accepts that its plan is not "positively prepared" nor "consistent with national policy", contrary to paragraph 36 of the NPPF. Castle Point has spent £1.6m of taxpayers' money on developing an inadequate housing plan once												

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								again. If you build on this land, the ground floor is only usable for storage or a car. To build this floor cost approximately £60,000 of government and taxpayer's wasted money. Castle point council are abusing the existing government and have been doing so since 1998. Where is a company Dove property group and Dove Jeffery											

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								homes we were proposing and working with counsellor or calling for local sites since 2005 over a period of 20 years. We have spent a considerable amount of money in time Trying to bring forward a credible scheme to build affordable housing for local residents and young people with a total of 36 acres currently under our control but also											

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								we have formed the north west thunders ley consortium over 100 acres of Greybelt Land which potentially could deliver up to 4000 homes in NW Thunder sley for Castle Port Council and the local residents with other developers. Which this would link to major roads relieve the traffic and also various hospital schools and infrastru											

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								cture you know we have done the studies in the master plan on this. The land is actually a grey belt site which were outlined to the council in a meeting and explained all our latest plans in early 2025 and they were very keen on the concept and proposal . It is the opinion of many in the borough that the council doing this to please a few local												

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								and influential people with vested interest and a lot not looking to the future of the borough particularly the young people the homeless and key lead 3 to 4 bedroom home starter homes in the region of £400,000 to 500,000 which doesn't give a young people a chance to get on the housing ladder and this is what we want to do. It's our											

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								aim as a company as an ethical builder and company having built thousands of houses in this particular Essex Suffolk Norfolk region we have the necessary experience and track record to deliver that a product for young people that is affordable and is within the government guidelines and objectives. The general consensus is that the											

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								government needs to put their foot down and put pressure on these councils to deliver and show who is in control about the future development of our country and its planning requirement. Misaligned incentives Councilors have made no secret of the fact that releasing Green Belt land is electorally toxic. Their incentive is therefor											

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								<p>e to publish an undeliverable plan, secure in the knowledge that:</p> <ul style="list-style-type: none"> ● Speculative development will be blamed on Planning Inspectors, not local politicians. ● Castle Point is likely to be merged into a new "South Essex" unitary authority under current reorganisation proposals; members prefer to leave politically difficult 												

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								decisions to the successor council. The result is a plan that frustrates both Government housing objectives and the wishes of the electorate that voted overwhelmingly for change at the last general election.											
0823-0002	Organisation	Pat	Abbot	Environment Agency	Yes	SP3	Yes		Yes		The proposed 173 homes at Thorney Bay and the additional 3,143 across Canvey Urban Sites Allocations and Broad Location (Policies C1, C4, C9 and C10)" – poses further challenges to the performance on the existing non-tidal drainage infrastructure currently serving the Island. The bulk of the surface water infrastructure is Anglian Water's but they connect to the Environment Agency's	The proposed 173 homes at Thorney Bay and the additional 3,143 across Canvey Urban Sites Allocations and Broad Location (Policies C1, C4, C9 and C10)" – poses further challenges to the performance on the existing non-tidal drainage infrastructure	No	Not Answered		A	Encourages liaison with the environment agency at the earliest opportunity	Comments noted. Please see modifications to policy C8	N

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											pumping stations via designated main river watercourses. This should be noted in reasoned justification for the policy and developers should be encouraged to discuss this issues and potential challenges it poses with the Environment Agency at the earliest opportunity.	currently serving the Island. The bulk of the surface water infrastructure is Anglian Water's but they connect to the Environment Agency's pumping stations via designated main river watercourses. This should be noted in reasoned justification for the policy and developers should be encouraged to discuss this issues and potential challenges it poses with the Environment Agency at the earliest opportunity.							
0339-0001	Organisation	Sarah	Bowerman	Essex and Suffolk Water		SP3	Not Stated	The housing requirement set out in Policy SP3 is stepped, with a minimum of 209 new homes per year for the years	Not Stated		To ensure we have a sufficient lead-in time to address any potential water supply issues ahead of planning permission being granted, for both employment land or housing provision, we strongly encourage developers to submit a pre-planning enquiry to Essex and Suffolk Water (ESW) (www.eswater.co.uk/developers/large-developer/pre-planning-enquiry). We would be grateful if this could be made a requirement of your					A	In accordance with our legal obligations, we will provide connections to our network for all housing developments but would welcome further discussion with you regarding build profiles and timings so that we can plan this work as	Build profiles and timings will be subject to confirmation at Plan adoption and monitored via the Annual Monitoring report (AMR) and housing land supply monitoring (see Housing Topic Paper), which are publicly available. Whilst Councils can encourage pre-	N

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								2026-31 (years 1 to 5), increasing to 253 new homes per year for 2031-2036 (years 6-10) and at least 554 homes per year from 2036-43 (years 11 to 17). We note most of the housing allocation sites are within Canvey, Benfleet, Hadleigh and Thundersley. In terms of water supply, water companies have a statutory obligation to meet and			planning process. This will allow us to assess the proposals and provide timely feedback before applications are formally submitted and considered by the planning authority. It is important to reiterate that Essex and Suffolk Water considers all applications across our entire operating area carefully, covering several councils and many varied development plans. Please be aware that ESW water supply area boundaries will not necessarily align with that of any council's and the positioning and volume requirements of any connection new to our water network will impact on the costs associated. Similarly, the timing of any council's planning is unlikely to coincide with the timing of our own business planning, and we must be considerate to all our regulators.						efficiently as possible. To ensure we have a sufficient lead-in time to address any potential water supply issues ahead of planning permission being granted, for both employment land or housing provision, we strongly encourage developers to submit a pre-planning enquiry to Essex & Suffolk Water (ESW) (www.eswater.co.uk/developers/large-developer/pre-planning-enquiry). We would be grateful if this could be made a requirement of your planning process. This will allow us to assess the proposals and provide timely feedback before applications are formally submitted and considered by	application discussions, it is an optional, discretionary service and cannot be made a requirement. The constraints derived from unaligned geographic boundaries and of unaligned business and spatial planning timescales are noted.	

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								supply all domestic demands but are not statutory consultees on planning applications. In accordance with our legal obligations, we will provide connections to our network for all housing developments but would welcome further discussion with you regarding build profiles and timings so that we can plan this work as efficiently as									the planning authority. It is important to reiterate that Essex & Suffolk Water considers all applications across our entire operating area carefully, covering several councils and many varied development plans. Please be aware that ESW water supply area boundaries will not necessarily align with that of any council's and the positioning and volume requirements of any connection new to our water network will impact on the costs associated. Similarly, the timing of any council's planning is unlikely to coincide with the timing of our own business planning, and we must be considerate to all our regulators.		

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								possible											
0683-0001	Organisation	Carl	Brampton	Essex Architectural Planning Limited	Yes	SP3	No	Does not meet Paragraph 32 of NPPF	No	Effective	<p>Starting with Policy C1 – Canvey Town Centre, this proposes that a potential of 620 new homes could be constructed within the Town Centre whilst retaining its commercial areas. However, there is little free land availability within the area identified by the Draft Local Plan. This can only mean one thing, an increase in the height of the building to become a more urbanized town.</p> <p>On the outset, you may think that this seems a reasonable and good use of brownfield development sites. But there appears to be a clear lack of understanding of the practicality of this style of development. Canvey Island has poor soil conditions which means that we must build here on Raft Foundations. However, the soil conditions limit the amount of development that can be achieved, typically 3 storey buildings. There are a couple of slightly taller buildings, but you won't find anything here</p>	The viability of developments need drastic review including the 5 year sustainable supply of housing.	No	Not Answered	Not Answered	A	<p>Density and capability of building tall buildings on canvey</p> <p>Charfleets</p> <p>Flood Risk on canvey</p> <p>Third Road off Canvey</p> <p>Infrastructure</p>	<p>Density</p> <p>The densities chosen for the sites within the Plan were informed by the Density and Capacity Study July 2025, please see this for further details. The Plan has taken into account the constraints on Canvey with regards to foundations and has not proposed heights above 31/2 stories on Canvey Island for this reason.</p> <p>Charfleets</p> <p>Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar</p>	N

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											<p>on Canvey over 4 stories.</p> <p>Existing buildings in the area would've been constructed with foundations that are only suitable for this number of floors at the most. So, there is simply no way that the existing buildings would be able to accommodate multiple floors of development. And then where do you place all the parking spaces for this additional development if you are going above the existing properties?</p> <p>The heart of the Town is the Knightswick Centre, a building which is in much needed refurbishment and updating to support the local community. Within the Castle Point Issues and Options document released in 2024, it indicated that this could have potential for 140 homes, which I think is reasonable.</p> <p>However, the council has just signed an agreement which sees them spend £2million on a refurb, only to then suggest they may need to knock it down to build homes within this local plan! The expenditure of this amount of taxpayer funds raises concerns about the long-term strategies surrounding the development of the town centre.</p> <p>Moving on to the biggest issue with this Local Plan, Policy C4 – West Canvey. The proposal</p>												<p>employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'. This policy will apply until such time as a master plan for West Canvey has been developed. Policy E1 may subsequently change in terms of its approach to Charfleets when the Castle Point Plan is reviewed in 5 years' time, to enable the delivery of the West Canvey regeneration.</p> <p>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</p>	

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											<p>here includes the entirety of Charfleets Industrial, Morrisons and a field west of Roscommon Way that could be suitable for up to 2,700 new homes, apparently. 2000 of which is going to be allocated within this Local Plan up to the year 2043.</p> <p>What the plan fails to consider is how this would even be feasible. Charfleets Industrial Estate is the centre of Canvey Island's employment and commercial industry. So, what is going to happen to the businesses and employment within this area when you are looking to replace large portions of this? How exactly is this even going to be feasible with so many landowners, businesses and other parties that would be affected by development.</p> <p>Being part of this community on Canvey Island, I like many others would be extremely concerned about the potential impact it will have upon this area and the businesses which support the local economy.</p> <p>What is even more concerning is that the Local Plan suggests that this housing development should be provided at a density of around 150 dwellings per hectare. To put that in perspective, in Essex the average density is around 65 dwellings per hectare. Here on Canvey Island, it is much less.</p>													<p>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.</p> <p>Third Road off 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,</p>	

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											<p>Canvey Island has approximately 16,000 homes, in a development area of around 675 ha as you can see from the map below. This includes some of the green spaces, but I've removed areas such as Smallgains, Waterside and Charfleets to make it a fair comparison. This provides around 23 dwellings per hectare. What they are proposing on the Charfleets area would increase the density of the area by 7 times what is present on Canvey Island!</p> <p>This severe increase in density will change the composition of Canvey Island completely. This will have a dire effect on the character of the Local Area and Canvey Island as a whole, something that a Local Plan should seek to protect.</p> <p>Lastly, I want to touch upon the infrastructure upon Canvey Island and the impact that this will have upon the local area. Canvey Islands issues typically surrounding Traffic, Drainage and Flooding.</p> <p>Drainage and Flooding are serious concerns for the residents of Canvey. As someone that has been involved in developing new properties on the island, I do believe that these can be mitigated with good design.</p>												<p>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.</p> <p>Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p>	

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											<p>This must be supported, however, with considerably investment by the Local Authority and Drainage Companies, which has been the main issue over the past years.</p> <p>Traffic is simply something that cannot be mitigated against without a Third Road existing Canvey Island. This is something that the Local Plan fails to provide. The Council's suggestions for resolving this major issue are to provide some additional cycle routes, pedestrian crossings, changing some junctions and re-routing some bus services. This simply will not change anything, especially if they plan to provide a further 3000 homes, which would provide for around 10000 additional occupants.</p> <p>It was only this weekend when evidence of this was clear. A major accident occurred on Canvey Road which then prevented access along this route. The delays then meant there was only one route onto the Island which caused heavy congestion for many hours. The suggested alterations simply would not resolve this issue.</p> <p>I'm yet to even touch upon other community infrastructure that Canvey Island lacks such as Doctors, Dentists and School Places.</p>									

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											None of this appears to be considered appropriately within The Local Plan. This is evident where in Policy C4 it suggests that only 56 nursery places and 0.13 hectares of land is provided for primary school provision. This is to support 2000 homes and potentially 6000 people. This is simply inadequate.									

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0282005	Organisation	Kevin	Fraser	Essex County Council	Yes	SP3	No		No	Justified, consistent with national policy	ECC does not consider the Castle Point Local Plan (CPLP) to be legally compliant due to its failure to meet its standard methodology housing need requirement as outlined in the NPPF and National Planning Practice Guidance (NPPG). Paragraph 62 of the NPPF states that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.” The current target for CPBC is 686 homes per annum using the standard method set out in the NPPF 2024, and updated to May 2025, which equates to 11,662 homes over the Plan period to 2043. The Plan is seeking to provide 6,196 homes (53%) up to 2043 within the existing urban area only, which results in a significant unmet housing need of around 5,500 homes. Housing requirements have significantly increased across South Essex (around 28%) and there are notable physical and environmental constraints, including a substantial proportion of land designated as Green Belt, international/National and local environment constraints, highway and junction capacity pressures and a significant proportion falling within Flood Risk Zone 3. CPBC have held meetings	ECC considers that CPBC has not fully met its legal compliance with respect to the Duty to Cooperate and the IDP given: • the IDP May 2025 is not based on the infrastructure requirements required to deliver 6,196 homes in Policy SP3 but three growth scenarios between 4,862 to 8,845 homes; • significant evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including the Transport Assessment, and which ECC had not reviewed prior to the consultation; • Prior to submission, ECC will need to undertake a cumulative assessment of the growth consistent with Section 3.4 of the Essex County Council Local and Neighbourhood	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Considers the Castle Point Plan does not meet the Standard Methodology Housing Need requirement outlined in NPPF, but notes that there are notable environmental constraints including Green Belt, International and National designations, flood risk and highway and junction capacity issues. Comments that Castle Point has had DtC meetings and made requests for its neighbouring authorities to assist with its unmet housing needs and no opportunities have come forward outside its boundaries to meet its unmet need. Recommends SoCG prepared. Notes that evidence has been put	housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure constraints as well as the capacity of the housing market to deliver the level of growth . The CPBC position is supported by evidence from the Green Belt Assessment, Strategic Land Availability Assessments and Housing Topic Paper. Sites were assessed according to various criteria including Green Belt role, flood risk, impact on designated environmental and heritage sites, regard to the Essex LNRS, site access, transport network capacity and viability implications. The Castle Point Plan is a new and different plan based on new evidence and is not comparable to the previously	Housing Supply at April 2023 2025 Thorney Bay (transitioning to Sandy Bay)

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											<p>under the duty to cooperate with its neighbours within the Strategic Housing Market Area, neighbouring and nearby local planning authorities and requested whether those councils would be willing to take any unmet need (non-defined level of need). Early responses suggested not. Likewise, CPBC has received requests from adjoining and nearby authorities to meet their unmet need to which the Council has responded negatively given the constraints in the Borough. Implementing the Duty to cooperate and the preparation of Statements of Common Ground is the most constructive approach to progress the matter. It should be noted that the DtC does not extend as far as a duty to agree that the borough's unmet need can be accommodated. In addition, ECC has some concerns regarding the robustness and transparency of the evidence to justify the significant shortfall of 5,500 homes. For example, the Green Belt Sites Assessment concludes that only a limited number of Green Belt sites may be suitable for further consideration, but none are allocated. It is unclear what 'weight' has been given to the assessment of these sites with regards:</p> <ul style="list-style-type: none"> • how circumstances have substantially changed on several Green Belt sites which were allocated in the 	<p>Planners' Guide to School Organisation and Place Planning (September 2025) for education and early years and childcare to inform, policy requirements; the IDP and Whole Plan Viability Assessment. Prior to submission, the IDP will need to be updated to reflect the significant new policy guidance and evidence base that has been undertaken since it was prepared early in 2025. ECC recommend the Table supporting Policy SP3 is updated to read: Housing Supply at April 20253 ECC recommend consideration is given to the phased delivery of supported and specialist housing as set out in the SSHANA. ECC require Criteria 1 is deleted.</p>				<p>forward to support CPBC housing strategy but queries its robustness and transparency in light of the short fall of housing. Queries the non-inclusion of any potential development sites assessed in the Green Belt assessment including those that were previously recommended for allocation in the 'withdrawn' Local Plan, the inconsistent weight given to 'significant' and 'severe' impact of growth on highway capacity in determining site deliverability in transport terms and the weight applied to Strategic Combined Opportunity Areas for biodiversity in site allocation criteria.</p> <p>There have been regular meetings between ECC and CPBC with</p>	<p>withdrawn plan of June 2022.</p> <p>CPBC realises that the Castle Point Plan delivers considerably less housing than the Standard Method Housing Need but considers based on the evidence that this is a realistic housing delivery. Unmet Housing Need has been considered through the SEC and directly with neighbouring authorities. Relevant Statements of Common Ground have been put in place. Ultimately, the soundness and legal compliance of the Castle Point Plan and its evidence will be decided at examination. It is agreed that CPBC and ECC have held regular meetings during the preparation of the local plan including sharing drafts of the Castle Point Plan for review. It is agreed that there has been additional evidence published since the</p>		

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											<p>withdrawn Plan by CPBC and supported by the Inspector following examination, with regards their impact on highway capacity, opportunities to enhance active and sustainable travel measures, and issues regarding site access (namely partly via residential routes).</p> <ul style="list-style-type: none"> the inconsistent reference to the 'severe' impact of growth on the highway network – the TA refers to 'significant impact' and parts of the Plan refers to 'severe' with regards the general performance of the network and at specific locations. It is unclear what 'weight' has been given to the impact on the highway network in determining the deliverability of sites identified in the Green Belt Site Assessment. A number of recent appeals have been allowed despite junctions modelled as being operating at or close to capacity. The impact was not considered severe by Inspectors with respect to NPPF e.g. APP/F2360/W/22/3295498 for housing at Penwortham, Preston. CPBC will need to be satisfied that their approach to severity is defensible at examination. the weighting given to Strategic Combined Opportunity Areas (SCOA) identified in the ELNRS. This may have been influenced by the reference to their need to be 'safeguarded' in Policy SP1 rather than 'enable and support'. PPG refers to 	<p>1. The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development. ECC require Criteria 2 is amended to read: Where necessary, the Council will seek developers to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms, in accordance with the tests set out in the National Planning Policy Framework (NPPF) and the provisions of the Community Infrastructure Levy Regulations and having regard to the provisions of the Infrastructure Delivery Plan.</p>				<p>regards the preparation of the Castle Point Plan and early drafts of the Plan have been shared with ECC.</p> <p>EPOA's net zero development and Essex Parking Guidance and Local Transport Plan have all been incorporated into the plan, although some amendments were still necessary.</p> <p>However, significant evidence has been completed post the preparation and publication of the IDP May 2025 and needs to be incorporated into an updated IDP. The IDP May 2025 is based upon three growth scenarios and not the final housing strategy and sites set out in the Reg 19 consultation Plan. As a result</p>	<p>preparation and publication of the IDP May 2025. Following feedback from the Reg 19 Consultation CPBC is updating some of its evidence base including the Transport Assessment and Infrastructure delivery Plan. The latest evidence and feedback will inform the proposed modifications to be submitted alongside the Plan. Prior to submission ECC will be required to undertake a cumulative assessment of the infrastructure needs based on the proposed housing strategy set out in the Reg 19 Plan, namely 6,196 homes, particularly around primary, secondary and early years education and childcare and SEND, and the additional evidence. CPBC will provide ECC the updated Transport Assessment to review prior to submission of the</p>		

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											<p>Planning Practice Guidance states in preparing local plans the LPA has a legal duty to 'have regard to' the relevant strategy for their area. A key role of ECC is to maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires ECC to ensure that development, planning and infrastructure delivery across the administrative county, is aligned. This is to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Such requirements cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good".</p> <p>ECC has held regular meetings with CPBC with regards the preparation of the Plan in terms of general policy matters, the evidence base (including the Transport Assessment), early draft iterations of the Plan (including its policies) and the IDP. ECC provided formal responses to the Issues and Engagement and Issues and Options consultations. ECC has ensured that the Essex Planning Officers Association (EPOA) policies and evidence regarding net zero development have been included in the Plan, namely Policies SD4 and SD5, and further updates are provided as part of this consultation.</p>						<p>EEC considers that CPBC has not met its duty to cooperate on this matter.</p> <p>Evidence that needs to be incorporated into the Plan and IDP includes; ECC Developers Guide to Infrastructure Contributions (Nov 2025), Castle Point LCWIP, Essex LCWIP July 2025, Local Transport Plan July 2025 (including the South Essex Implementation Strategy (July 2025)), SSHANA July 2025 and the Shared Standards in Water Efficiency June 2025. ECC did not have the opportunity to review the West Canvey Addendum (Aug 2025) prior to the commencement of the Reg 19 consultation. This evidence has implications on the IDP May 2025 and ECC would need to do further</p>	<p>Castle Point Plan for examination.</p> <p>The IDP will be updated to include all latest information and evidence for ECC review. Accepted amendment to table made. Noted Housing trajectories to consider the provision of supported and specialist housing Accepted. Accepted and additional text added for clarity</p>	

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											<p>ECC has ensured that the key messages from the EPOA Essex Parking Guidance, Local Transport Plan - A Better Connected Essex and water efficiency requirements have been incorporated into the Plan, although some amendments are still necessary.</p> <p>Whilst officer meetings have been held with ECC to discuss the emerging spatial strategy, its implications with regards infrastructure requirements and the preparation of the IDP Baseline and IDP, May 2025, ECC considers that CPBC has not fully met its legal compliance with respect to the Duty to Co-operate</p> <p>Significant evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including significant evidence base referenced in the Plan has been completed post the preparation of the IDP (May 2025), including the updated ECC Developers' Guide to Infrastructure Contributions (September 2025); Castle Point LCWIP; Essex Wide LCWIP; Transport Assessment (July 2025) and West Canvey Addendum (August 2025); Local Transport Plan A Better Connected Essex Transport Strategy (July 2025) and South Essex Implementation Strategy (July 2025); Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); ELRNS (July 2025); and</p>						<p>assessment on the infrastructure impacts of the proposed housing strategy, as set out in the Reg 19 Plan.</p> <p>There have been regular meetings between ECC and CPBC with regards the preparation of the Castle Point Plan and early drafts of the Plan have been shared with ECC.</p> <p>EPOA's net zero development and Essex Parking Guidance and Local Transport Plan have all been incorporated into the plan, although some amendments were still necessary.</p> <p>However, significant evidence has been completed post the preparation and publication of the IDP May 2025 and needs to be</p>		

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											<p>Shared Standards in Water Efficiency (June 2025). The published IDP (May 2025) is not based on the infrastructure requirements required to deliver either Government's standard methodology housing requirements or the CPBC 6,196 homes, as set out in Policy SP3 but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt. Whilst the strategy remains 'urban focussed' the allocated sites informing the IDP, May 2025 and site allocations in the Plan differ in terms of scale and their distribution. The Sustainability Appraisal, paragraph 28, bullet 1 infers that the plan policy position and Scenario 1 in the IDP are similar. In fact, there are significant differences in that some sites have been removed from the Plan and some 16 sites have been subject to significant change, which will impact on any infrastructure requirements. For example, West Canvey has increased from 1,000 to 2,700 homes (of which 700 post 2043) and Canvey Town Centre has increased from 200 to 820 homes. To demonstrate the implications, ECC, as the lead authority for Education, has undertaken a 'high-level' assessment of the Plan's growth on primary education and early years and childcare places (see Appendix 4). The</p>							<p>incorporated into an updated IDP. The IDP May 2025 is based upon three growth scenarios and not the final housing strategy and sites set out in the Reg 19 consultation Plan. As a result EEC considers that CPBC has not met its duty to cooperate on this matter.</p> <p>Evidence that needs to be incorporated into the Plan and IDP includes; ECC Developers Guide to Infrastructure Contributions (Nov 2025), Castle Point LCWIP, Essex LCWIP July 2025, Local Transport Plan July 2025 (including the South Essex Implementation Strategy (July 2025)), SSHANA July 2025 and the Shared Standards in Water Efficiency June 2025. ECC did not have the opportunity to review the West</p>		

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											<p>assessment identifies the following changes in requirements:</p> <ul style="list-style-type: none"> • Consultation Plan – identifies the need for two 56 place early years and childcare nurseries and primary provision (non-defined). • ECC assessment – identifies the need for at least a new 2FE primary school; three new 72 place nurseries, of which one should be co-located with the primary school; one stand-alone 56 place nursery and potentially two further stand-alone 30 place nurseries subject to land being made available by developers. <p>Prior to submission, ECC will need to undertake a cumulative assessment of the growth consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (September 2025) for education and early years and childcare. The assessment must be consistent with the updated ECC Developer's Guide for Infrastructure Contributions (September 2025) and reflecting the updated DfE Scorecard (Q1 2025) costs for education provision per place. ECC needs to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Such requirements cannot place an unaffordable cost burden on</p>											Canvey Addendum (Aug 2025) prior to the commencement of the Reg 19 consultation. This evidence has implications on the IDP May 2025 and ECC would need to do further assessment on the infrastructure impacts of the proposed housing strategy, as set out in the Reg 19 Plan. Prior to submission ECC will be required to undertake a cumulative assessment of the infrastructure needs based on the proposed housing strategy set out in the Reg 19 Plan, namely 6,196 homes, particularly around primary, secondary and early years education and childcare and SEND, and the additional evidence. EEC reviewed		

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											<p>the public purse or require early intervention to retrofit or “make good”.</p> <p>CPBC and its consultants Systra have held regular meetings with ECC with regards the preparation of the transportation evidence base. The TA Scoping Report was reviewed by ECC and considered an appropriate piece of evidence to support the Regulation 18 Consultation (Issues and Options – July – September 2024). However, ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of the consultation. An update to the Transport Assessment (TA), Transport Assessment Addendum; and Green Belt Sites Assessment will be required to address the issues, observations and queries identified following the ECC review of these documents (see Appendix 5) and will subsequently inform an update to the IDP.</p> <p>ECC recommend the title of the housing supply table in paragraph 2 should be amended to 2025 to be consistent with the residential land monitoring position set out in the Housing Topic Paper of 1 April 2025.</p> <p>While the stepped housing trajectory in Policy SP3 is welcomed, consideration</p>											<p>the transport assessment scoping report prepared by the consultants Systra, but the completed TA and the West Canvey Addendum could only be reviewed as part of the consultation. ECC provided substantive comments on the TA and its Addendum as part of the consultation, which require to be addressed prior to submission and its impact on the Plan and supporting IDP Requests an amendment to table title for consistency with monitoring position in Housing Topic Paper April 2025</p> <p>Recommends that consideration should be given to the trajectory of supported and specialist housing within its housing strategy</p>		

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											<p>should be given to a trajectory for the provision of supported and specialist housing. Estimated need is set out in the SSHANA for the period up to 2029, 2034, 2039 and 2044. ECC recognises that delivery is often market-led, but the Plan could better demonstrate how it will support delivery over the plan period.</p> <p>As worded, Criteria 1 implies that contributions will only be made if the site is linked to an infrastructure item listed in the IDP. The IDP is a 'living document' and will change over time as more information is known regarding particular site requirements.</p> <p>The purpose of the policy should be to ensure that all sites (including windfalls) make an appropriate contribution towards the necessary infrastructure consistent with the statutory tests in regulation 122 (as amended by the 2011 and 2019 Regulations), namely necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>ECC generally supports the policy as it has been adapted to suit local circumstances from the ECC modal policy on 'Infrastructure Delivery and Impact Mitigation', which has been included in other adopted Local Plans in Essex. For clarity, criteria 2 should</p>													

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											<p>make it clear that a development can be made acceptable in planning terms through direct provision and/or proportionate contributions rather than only contributions.</p> <p>This amendment would be consistent with Strategic Policy SP2, criteria 3a which states:</p> <p>a. Provide or make a proportionate financial contribution to the delivery of necessary infrastructure alongside growth;</p> <p>And Policy Infra2, criteria 2 which states:</p> <p>2. Where a development proposal, either individually or cumulatively, increases demand for education facilities beyond those available within the local area, development will be required to provide land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities.</p>											

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02850001	Individual	Karen	Page		Yes	SP3	No	Dear Sir/Madam I do not support the castle point plan regulation 19 draft consultation. I do not consider the draft plan to be legally compliant. Reason : It fails to consider strategic alternatives like North West Thundersley. It has no credible 5 year housing land supply.	No	Justified, consistent with national policy	I do Not consider the draft plan to be sound Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for castle point. The site selection ignores green belt / grey belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a " no green belt build policy". The site selection is based on the "over development of brown field sites". Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guide lines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. The 3316+ urban homes for Canvey is not resident led.	Proposed Modification: Add North west thunderously site.	Not Stated		No		Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guide lines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure.	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		(SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
02860001	Individual	Brian	Percy		Yes	SP3	No	Dear Sir/Madam I do not support the castle point plan regulation 19 draft consultation. I do not consider the draft plan to be legally compliant. Reason :	No	Justified, consistent with national policy	I do Not consider the draft plan to be sound Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for castle point. The site selection ignores green belt / grey belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a " no green belt build policy". The site selection is based on the "over development of brown field sites". Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guide lines state that development should be	Proposed Modification: Add North west thunderously site.	Not Stated		No		Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley.	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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								It fails to consider strategic alternatives like North West Thundersley. It has no credible 5 year housing land supply.			directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. The 3316+ urban homes for Canvey is not resident led.						NPPF guide lines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		considered through the SFRA.	
02870001	Individual	Gary	West		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and 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	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding.	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle

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											is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure.	Green Belt Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Point Strategic Flood Risk Assessment (SFRA).

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02890001	Individual	Jacqui	Thornton		Yes	SP3	No	Dear Sir/Madam, I cannot support the Castle Point Plan Regulation 19 Draft Consultation in its current form. I do not consider the draft plan to be legally compliant for the following reasons: It has not been positively prepared. The plan does not have a clear strategy that meets the assessed needs of the area that is consistent	No	Consistent with National Policy	The Plan is not consistent with national policy in promoting sustainable development as the NPPF requires consideration of the combined impact of developments on air quality at a local level. The plan proposes overdevelopment of urban areas and evidence documents accompanying the plan state this will result in poorer air quality for future inhabitants than the alternative of a more spacious approach. In calculating its windfall allowance of 45 homes per year, the council appears to have included the car park at a Sheltered Unit in Hadleigh as a site identified as suitable to support windfall development. This is not the case. The car park is already used to capacity to support the residents of the complex. The area is also a cul-de-sac housing a school entrance that already suffers from congestion and further housing in this area would add to an already hazardous hot spot. The Plan fails to consider reasonable alternatives when including this site as part of its windfall allocation. Residents of the complex who would be impacted have not been sufficiently consulted on this allocation during the draft plan being prepared. The evidence document identifying it on the map, the Castle Point Housing Capacity Topic Paper, was only uploaded on 15th August, two	PROPOSED MODIFICATIONS: Add North West Thundersley site Reduce densities in the Urban Town Centres Apply flooding and COMAH constraints to reduce allocation on Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation	Not Stated		No	A	The plan does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seeks to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply consistent with national policy. This consequently puts the strategic green belt it seeks to protect at greater risk of speculative development by	<u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Air Quality</u> Air quality impacts are assessed in the Sustainability Appraisal, including 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 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	N

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								nt with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seeks to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF,			weeks after the Reg 19 Consultation on the Plan opened. When questioned, Officers claimed the identification of Windfall Allowance sites was calculated using AI with no in person follow up was conducted to assess them, and consequently many of the sites may prove unsuitable. This leaves the calculation of the windfall allowance and its contribution to the housing total provided by the Plan flawed. By identifying the entirety of GB6 as Grey Belt land in evidence documents, there exists a conflict with National Policy because the council fails to acknowledge the existence of the Local Wildlife Site within the boundary of GB6. Local Area Wildlife Sites are designated for their high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF. The council has also failed to consider the alternative possibility of affording the GB6 wider protection by designating it as Local Green Space. This could be possible due to the tightly woven network of bridleways, natural footpaths and wildlife sites that already offer green space, recreation and access to natural habitat for existing residents. This offers potential for residents and local wildlife and conservation						providing a presumption in favour of development and the exceptional circumstances that justify permission. The Plan is not consistent with national policy in promoting sustainable development as the NPPF requires consideration of the combined impact of developments on air quality at a local level. The plan proposes overdevelopment of urban areas and evidence documents accompanying the plan state this will result in poorer air quality for future inhabitants than the alternative of a more spacial approach. In calculating its windfall allowance of 45 homes per year, the council appears to have included the car park at a Sheltered Unit in Hadleigh as a	points across the Borough suggest that air quality is improving. <u>Windfall Allowance</u> The Windfall allowance map included within the topic paper is an indicative map of potential windfall sites and are not allocated sites. The Windfall allowance has been calculated in accordance with historical trends. <u>GB6 and Grey Belt</u> It should be noted that GB6 has not been allocated for development in the Local Plan, Multiple environmental constraints on GB6 were identified in the Sustainability Appraisal, including multiple separate Tree Protection Orders, collectively covering approximately half the site and potentially severely limiting developability, ancient woodland on site - north east section does not appear developable for this reason,	

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								and cannot demonstrate a sustainable five year housing supply consistent with national policy. This consequently puts the strategic green belt it seeks to protect at greater risk of speculative development by providing a presumption in favour of development and the exceptional circumstances that justify permission.			organisations to draw funding for nature recovery and enhance the area's biodiversity and protect both the wildlife and integrity of the area. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Council Members have predetermined their stance on the Plan to fulfil an election pledge not to build on any Green Belt, failing to keep an open mind when considering evidence produced during the consultation period and have compromised the consultation by publicly informing residents that a failure to support the plan 'as is' will automatically result in all green belt being lost. Members and the council have failed to engage constructively with resident groups and residents who expressed concerns over the plan. Instead of listening to those concerns and responding with reasonable consideration, some Members have publicly insulted residents who questioned their approach. It is crucial that the alternative of NW Thundersley is rigorously pursued and obstacles challenged robustly in order that we can adhere to the Government policy in meeting their targets and not unnecessarily put the						site identified as suitable to support windfall development. This is not the case. The car park is already used to capacity to support the residents of the complex. The area is also a cul-de-sac housing a school entrance that already suffers from congestion and further housing in this area would add to an already hazardous hot spot. The Plan fails to consider reasonable alternatives when including this site as part of its windfall allocation. Residents of the complex who would be impacted have not been sufficiently consulted on this allocation during the draft plan being prepared. The evidence document identifying it on the map, the Castle Point Housing	approximately 2/3 of site covered by Priority Habitats (Protected under 2006 NERC Act): Deciduous woodland and mixed habitats - difficult to develop without significant harm. <u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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											remaining strategic Green Belt Sites at risk through modifications by the inspector or intervention.						Capacity Topic Paper, was only uploaded on 15th August, two weeks after the Reg 19 Consultation on the Plan opened. When questioned, Officers claimed the identification of Windfall Allowance sites was calculated using AI with no in person follow up was conducted to assess them, and consequently many of the sites may prove unsuitable. This leaves the calculation of the windfall allowance and its contribution to the housing total provided by the Plan flawed. By identifying the entirety of GB6 as Grey Belt land in evidence documents, there exists a conflict with National Policy because the council fails to acknowledge the existence of the Local Wildlife		

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																	<p>Site within the boundary of GB6. Local Area Wildlife Sites are designated for their high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF.</p> <p>The council has also failed to consider the alternative possibility of affording the GB6 wider protection by designating it as Local Green Space. This could be possible due to the tightly woven network of bridleways, natural footpaths and wildlife sites that already offer green space, recreation and access to natural habitat for existing residents. This offers potential</p>		

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																	<p>for residents and local wildlife and conservation organisations to draw funding for nature recovery and enhance the area's biodiversity and protect both the wildlife and integrity of the area.</p> <p>The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Council Members have predetermined their stance on the Plan to fulfil an election pledge not to build on any Green Belt, failing to keep an open mind when considering evidence produced during the consultation period and have compromised the consultation</p>		

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																	<p>by publicly informing residents that a failure to support the plan 'as is' will automatically result in all green belt being lost. Members and the council have failed to engage constructively with resident groups and residents who expressed concerns over the plan. Instead of listening to those concerns and responding with reasonable consideration, some Members have publicly insulted residents who questioned their approach.</p> <p>It is crucial that the alternative of NW Thundersley is rigorously pursued and obstacles challenged robustly in order that we can adhere to the Government policy in meeting their targets and not unnecessarily</p>		

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																	put the remaining strategic Green Belt Sites at risk through modifications by the inspector or intervention.		
0290001	Individual	DJ	Traer		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200,	No		No		Failed to consider strategic alternatives like North West Thundersley No credible five-year housing land supply. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest Thundersley</u> was considered but not preferred. The SOCG between CP and ECC set out	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue

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								alternatives like North West Thundersley and it has no credible five-year housing land supply.			sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no	with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.					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	the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Infrastructure</u> Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDS</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.							considered through the SFRA.	
0291-0001	Individual	IA	Traer		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Doesn't meet the housing target for Castle Point, Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guidelines state that development should be directed away	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u>	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											<p>The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.</p>						<p>from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.</p>	<p>Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Charfleets:</u> Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to</p>	<p>Strategic Flood Risk Assessment (SFRA).</p>

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																		provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	
02940001	Individual	Andrew	Thornton		Yes	SP3	No	Dear Sir/Madam, Please find below my Reg 19 Consultation submission to the Castle Point Plan. Please acknowledge receipt. I cannot support the Castle Point Plan Regulation 19 Draft Consultation	No	Consistent with National Policy	This consequently puts the strategic green belt it seeks to protect at greater risk of speculative development by providing a presumption in favour of development and the exceptional circumstances that justify permission. GB6 GB6 as a Strategic Green Belt site has been extended from H10 in the previous withdrawn plan to make it compliant with the councils policy that Strategic GB sites should accommodate over 100 dwellings. This includes land, including my own, that was not submitted in the CFS, nor do I consent to it being developed. By identifying the entirety of GB6 as Grey Belt land in evidence documents, there exists a conflict with National Policy because the council fails to acknowledge the existence of the Local Wildlife Site within the boundary of GB6. Local Area Wildlife Sites are	PROPOSED MODIFICATIONS: Add North West Thundersley site Reduce densities in the Urban Town Centres Apply flooding and COMAH constraints to reduce allocation on Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation	Not Stated		No	A	Housing Supply Does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seek to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as	Housing Supply Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. Standard method achievability also considered in the SA. <u>GB6</u> This site is not allocated for development. But it is noted that owner aspirations and sites not having been submitted is a further constraint on the realism of the overall housing target. Ecological constraints were identified in the SA/SEA and SLAa <u>North-West</u>	N

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								ation. I do not consider the draft plan to be legally compliant as it has not been positively prepared and is not justified due to not being compliant with national policy. The plan does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective Decemb			designated for their high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF. The area also consists of a large area of residential gardens (curtilage of existing dwellings), that are close and connected to the residential urban area enough that they should be afforded the exemptions identified from classification as PDL, as defined in the NPPF. The area includes equestrian grazing land that should also be afforded the exemptions identified from classification as PDL, as defined in the NPPF. In combination, these remove a substantially significant area of land that impacts the viability of GB6 as a viable strategic Green Belt site, and also redefines the possibility of Grey Belt designation. The plan, whilst it's objective seeks to protect strategic Green Belt sites from development, fails to consider the alternative of designating GB6 as a Local Green Space. This would not necessarily open land to the public that is in private ownership, as the designation itself does not mandate public access beyond what currently exists but offers protection for the site's special local significance, beauty, wildlife, and recreational value. The network of bridleways, footpaths and country lanes						defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply consistent with national policy. <u>GB6</u> This includes land, including my own, that was not submitted in the CFS, nor do I consent to it being developed. It also includes residential gardens Argues it meets Green Belt criteria by virtue of beauty, historic significance, recreational value, richness of wildlife. Alleges GB6 falls with Local Wildlife Site <u>PROPOSED MODIFICATIONS</u> : Add North West Thundersley site Reduce densities in the Urban Town Centres Apply flooding and COMAH constraints to reduce allocation on	<u>Thundersley Northwest</u> Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Canvey</u> Constraints have been considered.	

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								er 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seek to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply			that cover the sites are well used by the community for recreational purposes and are well used and valued by residents. GB6 meets the 'particular circumstances' that qualify a piece of land for Local Green Space Designation protection as it is close to the community it serves and is demonstrably special to the local community. It fulfils the criteria required as listed below: (a) Beauty the network of bridleways, footpaths and county lanes covering GB6 demonstrate visual attractiveness, and it contributes to landscape, character and setting of the area. It contributes to local identity and character of the area and offers a sense of place, making an important contribution to the physical form and layout of its surroundings. It also links up with Coombe Wood and Thundersley Glen which allows views beyond GB6 which are valued locally. (b) Historic significance The land forms part of the historic plot-lands linked to Jarvis Hall and still contains evidence of original dwellings from over a century ago. The land provides a setting for, and allow views of these buildings and the council has already identified some as potential local heritage assets. (c) Recreational value The land supports a variety of activities including horse riding, walking and cycling and is of local						Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation		

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								consistent with national policy.			significance for recreation and is valued by the community. (d) Tranquility GB6 provides an area of quiet tranquility that provides an oasis of calm and a space for quiet reflection. This benefits the well being of residents and aids positive mental health outcomes. (e) Richness of wildlife GB6 contains a valued habitat and is rich with wildlife, including protected species and hosts large areas of trees, hedges and plant life that help support them as well as having a Local Wildlife site within its boundary. Development restrictions on land designated as Local Green Space are strong, similar to the Green Belt, and new development is only permitted in exceptional circumstances. This designation would add remaining protection to the site even if, ultimately, its Green Belt status is removed through the Plan. Local residents and environmental groups are willing to be involved in working with the council to make this a reality, and a modification to include Local Green Space designation for GB6 should be added to the plan.												

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02980001	Individual	Alan	Tibbit		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Not all sites have been considered. No Greenbelt / Grey Belt sites added. Fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Site selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. NPPF guidelines state that development should be directed away from areas at highest risk of	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flooding and infrastructure</u> covered by policies	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.SUDsPolicy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
029-0001	Individual	Carol	Crawley		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Not all sites have been considered. No Greenbelt / Grey Belt sites added. Fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Site selection	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								North West Thundersley. It has no credible five-year housing land supply.			geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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0300001	Individual	Rebecca	Harris		Yes	SP3	No	Dear Castle Point Borough Council, Please accept the following as my response to the Regulation 19 consultation on the Castle Point Draft New Local Plan. As the Member of Parliament for Castle Point, I have always stood firmly alongside local residents in defending the character, integrity, and resilience of our Borough.	No	Positive, Effective, Justified, Consistent	Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley	Not Stated		No		<u>Green Belt</u> Welcomes the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. <u>North West Thundersley</u> That said, I do believe there is a case for a carefully considered exception in the	Recognition of strong community engagement noted. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Duty to Cooperate</u> Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Biodiversity</u> Policies ENV1 to ENV6 set out the Council's approach to protect existing	N

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								The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local			high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and	would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. I also encourage the Council to release a more accessible version of the consultation. Many residents have found the Regulation 19 process difficult to engage with due to its length and complexity. A more user-friendly approach would help ensure that all voices are heard. I urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.					site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. North West Thundersley	assets, and mitigate impacts including via Biodiversity Net Gain, LNRS and design features. The protection biodiversity features is reinforced via consideration these factors in relation to site options in the SA and SLAA; and also the mitigation of impacts upon international sites via the HRA process.	

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								identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known, and in parts of Benfleet and Hadleigh, where drainage infrastructure is under			industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the 'Canvey Third Access Task Force' in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period. The housing allocation to Canvey Island should be reduced and made						offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. NW Thundersley not adequately assessed in the SA. <u>Duty to Cooperate</u> : Fails legal duty. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation.		

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								strain. Also, significantly there are effectively only three highway access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first			contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of						Five Year Housing Supply The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Biodiversity The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical		

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								draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, for reasons I will			ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on							rather than practical.		

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								detail later in this response, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare			more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger									

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								opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more			transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new									

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								accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I would also like it to be acknowledged that, although the Council's approach to engagement has been broadly constructive and			junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light										

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								the consultations on the Plan well-advertised, many residents have found the Regulation 19 consultation difficult to engage with due to its length and complexity. It is vital that, where possible, this is made more accessible for residents, so that all voices in our community can be heard and understood. Hence why,			industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. Kind regards, Rebecca Dame Rebecca Harris MP Member of Parliament for Castle Point										

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								although I have attempted to answer all the questions in the consultation, I would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in											

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								this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. *											

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								The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thunderley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed											

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								housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning											

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								and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before												

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								submission for examination. A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of											

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone. The											

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								Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thunderley, an option that could deliver sustainable growth in a well-connected location,											

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								has not been adequately assessed. The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While											

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								the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as											

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								required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and											

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								evidence d supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress											

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								, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that											

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								ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy.											

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								While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a											

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								number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and											

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								needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing											

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								target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly											

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								why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West											

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								Thunder sley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thunder sley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b)											

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								of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability.											
03000002	Individual	Rebecca	Harris		Yes	SP3	No				<p>West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness¹.</p> <p>West of Canvey Road is essential to the integrity of Canvey Island's landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a</p>		Not Stated		No		<p><u>Canvey Allocation</u></p> <p>The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. The housing allocation to Canvey Island</p>	<p><u>Canvey</u></p> <p>All reasonable option sites, including on Canvey and elsewhere, were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Flood Risk and Infrastructure</u> Flooding and</p>	<p>Y - Policy SD3(3)</p> <p>3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape</p>

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											<p>floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against climate challenges. Reclassifying such a strategically important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF's requirement to safeguard land from encroachment².</p> <p>1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes." (p.41). "Equestrian land considered less open." (p.44).</p> <p>2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances.</p>						<p>should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route.</p> <p><u>Flood Risk and SuDs</u>, particularly on <u>Canvey</u> Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already</p>				<p>infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p><u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p> <p><u>Canvey Access</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan</p>	<p>character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).</p>

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																	<p>complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on</p>		

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																	water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime,		

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																	<p>high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints</p> <p><u>Canvey Access Issues</u></p> <p>The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the 'Canvey Third Access Task Force' in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period.</p>		

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030003	Individual	Rebecca	Harris		Yes	SP3	Not Stated		No	Not stated	<p>East of Canvey Road (GB3) The Council's justification for classing it as 'Grey Belt' land seems to be is that it is adjacent to existing built area was and previously considered for development, therefore seen as lower value¹.</p> <p>This parcel is wrongly characterised. East of Canvey Road provides separation between industrial uses and residential communities. Its open nature prevents ribbon development along this strategic road and offers necessary land for drainage and flood resilience. Canvey is already over-allocated with housing in this draft plan, to designate such land as Grey Belt ignores the island's unique vulnerability and the strong evidence from Essex County Council's Section 19 Flood Report³.</p> <p>1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes." (p.41). "Equestrian land considered less open." (p.44).</p> <p>3 = Section 19 Flood Investigation Report – Castle Point (Essex County Council, 2022) "Surface water flooding</p>		Not Stated		No		Objects to categorisation of GB3 as Grey belt	Noted.	N

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											across Canvey Island demonstrates the severe limitations of drainage infrastructure." (p.12). "Increased impermeable surfaces will exacerbate flood risk." (p.23)."									
0300004	Individual	Rebecca	Harris		Yes	SP3	No		No	Not stated	Land South of Charfleets (GB3) The Council's justification for classing it as 'Grey Belt' land seems to be the proximity to Charfleets industrial estate and perception of reduced "connectivity" ¹ . Land South of Charfleets forms a vital open break preventing sprawl from overwhelming this industrial area. Its greenery offsets industrial activity, provides amenity value and performs drainage functions. To downgrade it because of industrial adjacency is to misunderstand Green Belt policy, the NPPF explicitly highlights safeguarding the countryside from encroachment as a key purpose ² . A better and more balanced alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough's most		Not Stated		No		Objects to categorisation of GB27, GB31 and GB34 as Grey belt	Noted.	N	

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											<p>treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong and dishonest to not classify all or if not significantly more of the site as 'Grey Belt' when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents.</p> <p>1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes." (p.41). "Equestrian land considered less open." (p.44).</p> <p>2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances. West of Benfleet (Jotmans) (GB5) The Council's justification for classing it as 'Grey Belt' land seems to be based on somewhat fragmented ownership of the whole site (although large parts are in</p>												

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											<p>single ownership) and adjacency to existing residential development¹. The Jotmans fields are one of the most important open landscapes in Castle Point. They prevent coalescence between Benfleet and surrounding areas, retain visual openness and support biodiversity corridors. Fragmented ownership does not diminish value, indeed it may reduce development pressure. Residents have repeatedly resisted speculative schemes here, demonstrating it's continued community importance. Just as with Glebelands, I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning appeal stage and then the High Court. I am disappointed that those victories could be rendered meaningless by now designating it 'Grey Belt'.</p> <p>Land between Felstead Road and Catherine Road (GB6) The Council's justification for classing it as 'Grey Belt' land seems to be that its irregular shape and limited access diminish its strategic contribution¹. Shape and access are not tests of Green Belt worth. This parcel prevents outward sprawl from nearby roads and maintains openness in a heavily developed part of the Borough. It also supports biodiversity and drainage in an area prone to surface water</p>													

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											<p>flooding. To mark it as Grey Belt is to ignore its real-world function.</p> <p>The Chase (GB12) The Council's justification for classing it as 'Grey Belt' land seems to be that it is adjacent to residential development and the fact that has been assessed as having a lower contribution to the functions of Green Belt in SLAA¹. The Chase is an important open space separating built form and providing amenity value. It preserves the pattern of settlement and is highly visible to local residents. To release this parcel would set a precedent for creeping infill that undermines the wider Green Belt.</p> <p>East of Rayleigh Road (GB13) he Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of the current settlement boundary and, previously promoted for development¹.</p> <p>This land provides the rural setting of Rayleigh Road, preventing the blurring of urban boundaries. It supports biodiversity and acts as an accessible green corridor. Past promotion for development does not negate its current Green Belt functions. I stood with residents and the Council to fight against and win an appeal to prevent development on this site only last year. That victory should</p>													

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											<p>not be rendered meaningless by it being classified as 'Grey Belt' now.</p> <p>North of Grasmere Road (GB15)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a promoted site in SLAA and that is adjacent to an area of high housing noted¹.</p> <p>These open fields prevent sprawl and retain a strong settlement boundary. They also provide informal recreation for nearby residents and support biodiversity. To call this Grey Belt is to undervalue the clear openness and function it provides.</p> <p>East of Manor Trading Estate (NR3)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that the adjacent trading estate diminishes openness¹.</p> <p>This parcel is a buffer between employment and housing, mitigating noise and pollution. It safeguards residents' quality of life while preventing</p>													

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											<p>encroachment. Its role as a barrier to industrial creep is precisely the kind of function the Green Belt is meant to serve.</p> <p>Land North of Thundersley Church Road & East of Downer Road North (GB19)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of the current settlement and land promoted through the call for sites¹.</p> <p>This land forms a distinct wedge of open countryside that prevents coalescence, supports biodiversity and protects Thundersley's semi-rural setting. Its importance is recognised by residents who have fought repeated attempts to develop it.</p> <p>Land to the rear of 329 Benfleet Road (GB23)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a small parcel promoted in call for sites¹.</p> <p>Small parcels often have high value. This one prevents ribbon development and protects neighbour amenity. It should not be downgraded merely for its size.</p>										

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											<p>Land off Shipwrights Close (GB24)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a 'gap' site adjacent to housing¹.</p> <p>This parcel prevents settlement creep and maintains green relief for residents. Loss would encourage incremental erosion of the Green Belt.</p> <p>Land between Glen Haven and Ye Oaks, Bassenthwaite Road (GB26)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of a plot promoted for development¹.</p> <p>This site maintains the clear transition from settlement to countryside. Its openness is important locally. Downgrading it risks creeping coalescence.</p> <p>Land Adjacent 298 Church Road (GB27)</p> <p>The Council's justification for</p>														

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

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											<p>accessible and therefore make a lower contribution to the functions of Green Belt¹.</p> <p>Grandview Stables is a classic rural land use. It preserves openness and supports recreation. It should not be downgraded.</p> <p>The Council's classification of these parcels as "Grey Belt" is unjustified and dangerous. None of the sites above meet the Government's suggested criteria for such a label, they are not derelict, they are not redundant, and they are not expendable. Each makes a clear and demonstrable contribution to the Green Belt purposes set out in the NPPF.</p> <p>By applying the "Grey Belt" label the Council are not protecting the Green Belt but putting it at risk. Should the Plan be found unsound, these will be the first sites the Inspector turns to. That is why I urge the Council to review their classifications and to give the residents who live around each site the explicit opportunity to argue against the label before the examiners are invited to reassign their fate.</p> <p>Most importantly, I reiterate that the Borough's housing needs cannot and should not be met by sacrificing these vital sites. A better and more</p>												

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											<p>balanced alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough's most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong dishonest to not classify all or if not significantly more of the site as 'Grey Belt' when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents.</p> <p>I urge the Council to further consult with local residents specifically around 'Grey Belt' sites who many not be aware of the significance of the label and the implications of it if the Council's plan is found flawed and unsound by the Inspector.</p>											
03010001	Individual	Tracy	Laughton		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		It doesn't meet the housing target for Castle Point. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. The site selection ignores	Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape			

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								the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency	preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	evacuation procedures.	<u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
03020001	Individual	Kieth	Rider		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		It doesn't meet the housing target for Castle Point. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic

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								credible five-year housing land supply.									Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Flood Risk Assessment (SFRA).

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0300001	Individual	Nikki	Stoker		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding.	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u> Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt covered under policy GB2. Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
03050001	Individual	Rita	Stoker		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred	N

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								Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. Add North West Thundersley site. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt covered under policy GB2. Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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03060001	Individual	PJ	Ford		Not Stated	SP3	No	Dear Sir/Madam, Following my visit to your offices yesterday and conversation with your officer, please accept the following as my Consultation Response to the Castle Point Plan Reg 19 Consultation. I do not support the Castle Point Plan Regulation 19 Draft Consultation and I believe it is not legally compliant as it has no	No	Positively Prepared, Justified, Consistent with National Policy	And by failing to meet the statutory housing target calculated using the Standard Methodology, it is not compliant with national policy, has not been positively prepared and therefore is unsound. Please see the justification below. In calculating its windfall allowance of 45 homes per year, the council appears to have included the car park at Westwood Court Sheltered Unit as a site identified as suitable to support windfall development. This is not the case. The car park is already used to capacity to support the residents of the complex. The area is also a cul-de-sac housing a school entrance that already suffers from congestion and further housing in this area would add to an already hazardous hot spot. The Plan fails to consider reasonable alternatives when including this site as part of its windfall allocation. Residents affected have not been sufficiently consulted on allocation this prior to the draft plan being prepared and the evidence document identifying it on the map, the Castle Point Housing Capacity Topic Paper, was only uploaded on 15th August, two weeks after the Reg 19 Consultation on the Plan opened. The over development of the urban areas of Hadleigh is not sustainable. It does not take into account parking issues that have been consistently	PROPOSED MODIFICATIONS: Add North West Thundersley site Reduce densities in the Urban Town Centres Removal of Westwood Court Car Park from windfall allocation	Not Stated		No	A	Objects to Had4 The proposal for 114 homes is excessive and unsuitable for this location. The plan relies on a 100 dwellings per hectare (dph) urban density guide, whereas the surrounding area currently averages closer to 20dph. This would mean blocks of flats up to four storeys high, completely out of keeping with the existing character of Scrub Lane. The claim that the design would reflect the surrounding area is misleading, as the opposite side of Scrub Lane has far lower density housing, around 15dph, and the proposed development would not blend with the existing street scene. Introducing 114 homes and over 200 cars would put huge pressure on the	Comments noted	N

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								credible five years housing supply.			ignored in the area and exacerbating these will not support the existing traders due to falling footfall. The council's own sustainability evidence confirms that air quality will be poorer when dwellings are intensified in the urban areas. I believe NW Thundersley has not been adequately pursued as a sound, reasonable alternative. Finally, I believe Members have predetermined their decision of allowing no Green Belt to be included as a development site in the plan and this is to the detriment of the borough as a whole. Their online and in person treatment of residents questioning their approach has compromised the consultation process through intimidation and misinformation.						already busy Scrub Lane/Rectory Road junction and increase strain on local services, particularly doctors' surgeries. Additionally, pressure on local schooling and other infrastructure. Therefore to avoid putting further pressure on the local residents, ensuring that double yellow lines are put on all local roads to avoid the 200 cars parking locally, more doctors, more schools, more dentists, more local amenities, improved facilities (pipes / sewage). Residents have consistently supported the protection of Green Belt land and the use of brownfield sites for new housing. Nowhere did residents agree to destroy areas like Scrub Lane through		

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																	inappropriate overdevelopment. I understand land will be built on but this is unsustainable and therefore should be more fitting to suit the current infrastructure - for example 4 luxury homes. It is also worth noting that there some very old trees at least 20, all oak except one, an ash, not larch which should be preserved.		
0309-0001	Individual	Matt hew	Miller		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total	No		No		Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. NPPF guidelines state development should be directed away from areas at highest risk of	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County

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								legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.	housing target of 11,000.					flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led. The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Charfleets Industrial estate: It's inclusion as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially	North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with	<u>Charfleets Industrial Estate</u> is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes.	

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																	residential homes.		
0310001	Individual	Martin	England		Yes	SP3	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the biodiversity and environmental protection needs strengthening, there is	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	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall	Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a	No	A	Fails to consider strategic alternatives, like North West Thundersley. Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers	<u>Duty to Cooperate</u> addressed in the Duty to 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). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a	N

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								no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined. You only need to examine the credentials of the local plan board councillors to realise the biased ideology they have brought			review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, 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 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. The Reg 19 Local Plan Consultation document, published in July 2025 does not comply with the IDP document issued in May 2025. For example, the IPD document states 1000 homes max for Canvey West, but two months later that has been increased to 2700 homes, without any evidence. The IPD document states 80 homes for Scrub Lane, but two months later that has been increased to 114 homes,	Allowance 675. Total housing target of 11,000 Dredge Canvey Lake Revise Had4 Scrub Lane development to 20 homes. Remove the Had3 Hadleigh Clinic site from the local plan Remove Manor Trading Industrial Estate site from the plan. Remove Charfleets Industrial Estate site from the plan. Remove the Thun3A Thundersley Clinic site from the local plan		local plan that will be found unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban			throughout the planning process to consider the viability of NW Thundersley The biodiversity and environmental protection needs strengthening. There is no credible five-year housing land supply, nor does it meet the housing target for Castle Point. Lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined. 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	preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Numbers</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.	

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								to this local plan process. The obviously contrived error in the Reg 19 local plan consultation, having to open the process up again, is legally incompetent, with no justification except a politically motivated manipulation of the results, which needs investigating.			without any evidence. This was never resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. The Councils proposal for 6,196 homes on Brownfield only is urban destruction, and unsustainable. The Borough already has major issues where the roads are gridlocked, with traffic lights, road works, water pipe leaks, sewage system failure, gas pipe leaking, power surges, flooding, drainage blocked, the doctors are full, there are no dentists, no school places, and the residents complain constantly. This needs to be addressed with a new site to be considered in North West Thundersley. 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 DAC Planning Grey Belt document states the North West Thundersley site is not viable, but they were told by officers in the council to add a note "not to consider" North West Thundersley. There were also two NWT Dove Reports published on the Council's own website, with maps and plans for NWT, but they have mysteriously been removed from the website recently. This makes the removal of evidence worse than the lack of evidence.			areas, when there are viable sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case			policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply Green Belt/Grey belt covered under policy GB2. The Green Belt Assessment July 2025 reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for development as outlined in the Housing Capacity Topic Paper August 2025. Flooding and	

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											There is no justifiable reason to not consider North West Thundersley.			forward as to why our lake is still at risk with this plan that puts over three thousands houses on Canvey Island, but when found unso und, will lead to speculative development across our precious Greenbelt sites,				infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>Highways Impacts</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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														with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been seriously considered, like NW Thundersley.					

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03100009	Individual	Martin	England		Yes	SP3			No	Justified, consistent with national policy	<p>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.</p> <p>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, 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.</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found unsond, which will then lead to speculative development	No	A	Essentially the same points as made in Rep 0310-001 above by the same respondent on Policy SP3	Essentially the same responses made to Rep 0310-001 above by the same respondent on Policy SP3	N

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											<p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. 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.</p> <p>The Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms for NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers throughout the planning process to consider the viability of NW</p>			ent across our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered						

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											<p>Thundersley. The Council will also have regard to Essex County Council's (ECC) Developers' Guide to Infrastructure Contributions. ECC play an important role as an infrastructure provider in Castle Point. The IDP fail to address the infrastructure needs to meet the growth within the Borough, with a development on the scale of NW Thundersley.</p> <p>ECC have had no plan to review over the NW Thundersley, and the council continue to categorically state that access from the A130 is not viable, and Essex County Council refuse to permit an access to the A130 but plans show a scheme was positively discussed by CPBC, ECC and Basildon Council many years ago, but this has been ignored, see attached photo. This scheme shows what can be achieved with dialogue, the intention to progress positively and working in partnership. The ECC website states, in their Development Management Policy, all proposals are assessed and determined in relation to the Development Management Route Hierarchy Policies, where vehicular access is accepted in principle, the number of access points will be kept to a minimum and new access points will be designed and constructed in accordance with the current standards, where existing access is to be used</p>			d, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with this plan that puts over three thousands										

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											<p>substandard accesses will be improved and/or upgraded in accordance with the current standards for the category of road, and all proposals are assessed and determined against current standards for the category of road having regard to the capacity, safety and geometry of the highway network. The NW Thundersley site should be added as an alternative, with 50% of the area on the call for sites and 50% of the area is grey belt factoring in PDL, but not one site has been added to the local plan.</p>			houses on Canvey Island, but when found unso und, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites					

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														available which have not been seriously considered, like NW Thundersley.					
03120003	Individual	Jill	Walsh		Yes	SP3	No	Finally, Canvey Island - P38 onwards To suggest the development of over 3,000 dwellings on Canvey Island is unsound and not justified. It is a flood zone 3a	No	Not Stated			Not Stated		No		To suggest the development of over 3,000 dwellings on Canvey Island is unsound and not justified. It is a flood zone 3a area, had one major road to enter/exit the Island and has 2 COMAH sites. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. The	Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan.	N

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								area, had one major road to enter/exit the Island and has 2 COMAH sites. There is clearly and unequivocally an imbalance of housing allocation compared to the mainland area in Castle Point, with an obvious bias towards the policy of no building on the Green Belt, to the detriment of Canvey Island. NPPF guidelines state that									proposed developments place residents in the east of the Island at risk in the event of an emergency evacuation procedure. I believe it is imperative that this plan must introduce the controlled release of some Green Belt on the main land to reduce significantly the number of houses presently being considered for Canvey Island. It is ludicrous to suggest that Canvey Island has been allocated this huge amount of development when compared to other areas on the mainland	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	

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								development should be directed away from areas at highest risk of flooding. The proposed developments place residents in the east of the Island at risk in the event of an emergency evacuation procedure. It is ludicrous to suggest that Canvey Island has been allocated this huge amount of development when											

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								compared to other areas on the mainland											
0313-0001	Individual	Lucy	Olofinjana			SP3	Not Stated	Hello I am extremely concerned about any plans for building in the areas surrounding Sadlers farm roundabout, including any potential of hundreds of homes at Jotmans farm going onto Canary way. Canvey only has two roads in	Not Stated	Not Stated						A	Concerned about any plans for building in the areas surrounding Sadlers farm roundabout, including any potential of hundreds of homes at Jotmans farm going onto Canary way. Canvey only has two roads in and out, so Canvey Way cannot possibly cope with extra cars from a large development. The area is already very congested when one small thing goes wrong on Canvey, Benfleet or Rayleigh.	<u>Canvey Access</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	N

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								and out, so Canvey Way cannot possibly cope with extra cars from a large development. The area is already very congested when one small thing goes wrong on Canvey, Benfleet or Rayleigh . It has taken 1.5 hours in the past to travel from pitsea (my son's school) to benfleet due to traffic after an accident											

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								Hundreds more homes cannot possibly be considered in this area.											
03150001	Individual	Irena	Grant			SP3	Not Stated	I have only just been made aware of this and see the consultation is now closed! Why was it not more publicised?	No	Consistent with National Policy	I find the proposal to be unsound as the plan is for 7 thousand new homes but the Govt target for Castlepoint, as far as I can see, is twice that figure. Why hasn't the site at North West Thundersley been added? It has a good route in and out of the borough (with a few tweaks) and it will not further congest areas that are already congested on a daily, if not hourly basis, such as Hadleigh A13. I hope you will add my objection to your consultation and if possible reopen/extend the consultation with a greater publication of its existence so more residents are able to submit their views.						Objects to the exclusion of North west Thundersley	North-West Thundersley Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	N
03160001	Individual	Amy	Thompson			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consult	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a	PROPOSED MODIFICATION: Add North West Thundersley site.				A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

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								ation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. development should be directed away from areas at highest risk of flooding. Sustainable	was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
03170001	Individual	Brian	O'Grady			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be	PROPOSED MODIFICATION: Add North West Thundersley site.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt /	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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								consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is	Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0320001	Individual	John	Wellmen			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								land supply.									towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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0321-0001	Individual	Amy	Bailey			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been	Grey belt covered under policy GB2. SLAA and SA considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	considered, no Greenbelt / Grey Belt sites added. development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
03220001	Individual	Olegs	Sarans			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally complia	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified,	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound: Consider North West Thundersley Reduce the					Doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites, with no	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West</u>	N

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								nt, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. 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.	Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000. An assessment specifically around Canvey Island with flood zones being assessed and the impact these numbers would have on flooding					Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. 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.	Thundersley Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	
0325-0001	Individual	Ami	Philips			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased	PROPOSED MODIFICATION: Add North West Thundersley site.					Not all sites considered, such as North West Thundersley. The draft local plan is not justified and consistent with national policy. It doesn't meet	Grey belt covered under policy GB2. SLAA and SA considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to

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								Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. Development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
03260001	Individual	Ross	Day			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	PROPOSED MODIFICATION: Add North West Thundersley site.				A	Not all sites considered, such as North West Thundersley. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection	Grey belt covered under policy GB2. SLAA and SA considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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								North West Thundersley. It has no credible five-year housing land supply.			for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. Development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency	covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	evacuation procedures.		
0327-0001	Individual	Gordon	Retter			SP3	Not Stated	Having tried to study the documentation forming the basis and consideration of the plan, I would simply make the following comments Housing requirements One of my main thoughts concern the housing requirement methodology. How does the government arrive at this	Not Stated	Not Stated		Even if such increased housing gets approval, at the very least a third road is required that should incorporate a dual carriageway.					Critical of excessive housing number requirements and questions the methodology behind government numbers. Advocates the HNA 2023 figure of 255homes p/a. Questions whether this is local need or from East London. Believes growth is driven by financial incentives to sell at London prices. Says the urban first approach makes sense. Suggests that the retail parks are actually drawing people into the Borough and that they will decline in future due to the growth of online shopping. Questions whether	Points noted. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								figure. The figure of 686 homes per year appears excessive. The councils Local Housing Needs Assessment 2023 identified a need for approx 255 homes per year yet are now proposing 364. WHY? I constantly read that newcomers to Castle Point seem to come from East London and surrounding areas. That doesn't signify local									supporting infrastructure will be overwhelmed. Holiday plot land does not have proper drainage. Cites indirect source at Anglian Water expressing concern. Suggests a third road is needed to Canvey.	links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan The Council has met with Anglian Water to produce a Statement of Common Ground and agree policies.	

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								need to me. Whatever the reason, many of these new residents arrive first and then ask about schools, doctors, facilities etc after the event. I believe it maybe a financial incentive to sell property at London prices to then purchase less expensive property here in Castle Point leaving a surplus of funds. Also I believe population levels are reducing. Has											

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								this been taking into consideration. Also due to economic conditions many offspring of existing residents remain living with their parents as homes for many are unaffordable thus logically reducing the need for such increased local building. How were new homes businesses and other facilities locations decided? The											

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								urban first approach makes sense but the plan seems to propose the use of existing industrial sites for housing. Also we already have several retail parks on Canvey and another proposed on land opposite Morrisons off Roscommon Way Canvey. Such estates already attract visitors from beyond the borough in addition to its											

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								own residents bringing pressure on roads and infrastructure. Increasingly though retail shopping is generally declining due to online shopping so there should naturally be less need in future. Providing the right type of new homes Providing the right type of new homes As much as a convincing argument for more											

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								housing there is the overwhelming question of supporting infrastructure. The history of development particularly on Canvey means much uncontrolled building took place. Staking out land of a holiday plot to become proper houses took place on a large scale without proper drainage . I have spoken to an Anglian Water represen											

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								tative (a former neighbour) who told me the drainage system such as it is is a disaster. Inferior pipework joined to new housing pipework is creaking and could well fail on a large scale without any additional housing. We see only too often on Canvey flooded roads evidence of poor condition and maintenance. That's just surface water let alone											

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								unseen sewerage drainage . The overriding issue to object to such additional housing is the totally inadequate road system that can't cope with the existing housing stock and vehicle movement. All roads lead to two exits roads off Canvey both single carriage ways											
03360003	Organisation	Caroline	Peters	Essex Police		SP3	Not Stated	The DOCO was invited to attend the Castle Point Regulation 19	Not Stated			To evidence requirements within National Policy aligned to safety and security, and to substantiate commitments within Design and Access				A	Ensure alignment with national policy with regards to safety and security	Policy D1 requires opportunities for design out crime to be taken.	N

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								Draft Plan Stakeholder Workshop and further to this meeting recommends that the DOCO is contacted (ideally at the pre-planning stage) regarding future Master Plans, this will enable effective partnership working and ensure all new development are safe for all future users.				Statements, Health and Wellbeing Strategies etc, it is recommended Secured by Design (SBD) accreditation is considered. Please note that the DOCO would welcome the inclusion of Planning Conditions to not only secure SBD accreditation but where appropriate condition DOCO / Essex Police Engagement.								
0709-0001	Individual	joy margaret	raven	F81112	Yes	SP3	Yes		No	Justified, Consistent with national policy	it doesnt meet the national policy and it is not justified .Also it is not justified as the plan is biased or predetermined towards an anti -build on the greenbelt agenda.it has excluded viable alternative sites , and is based on the excessive over development of Brownfield	Need to add the Nort West Thundersley site ,the blinking owl site as known by many .Labelled GB16on the consulation .This 160 hectares ticks all the	No	Not Answered	Not Answered	A	North West Thundersley	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	N	

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											sites ,especially on Canvey island.	boxes. This could add up too 7500 homes.						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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08190001	Individual	Samantha	Whelan	GB Vehicles	Yes	SP3	No	Are there not other areas? Lowering jobs and increasing traffic	No	Justified	The local plan is not justified with the national policy. Doesn't meet the housing target for CPBC. Site selections ignore greenbelt/greybelt against new NPPF guidelines. Site selection strategy is biased and predetermined towards a "no greenbelt built policy". This is based on over development of Brownfields sites. Not all sites considered. No greenbelt/greybelt sites added and with the exclusion of NW Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey's unique geography and drainage infrastructure. The proposed homes for Canvey is not resident led and this development would put residents in the East of Canvey at risk with emergency evacuation.	Add NW Thundersley site. 187HA A greenbelt/greybelt Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050.	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 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	N

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																		<p>from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>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 should be</p>	

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																		<p>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 housing topic paper.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review,</p>	

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																		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 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	

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																		<p>policy GB2.</p> <p>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.</p> <p>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.</p> <p>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</p>	

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

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0343-0003	Agent	Ben	Weedall	Gladman Developments Ltd		SP3	No	Fundamentally, Castle Point Council Plan 2026 – 2043 Regulation 19 Draft July 2025 as proposed is unsound and should not proceed in its current form. The Plan does not plan for the Council's required housing need as calculated by the Standard Methodology and enshrined in national planning policy. The justification for not	No		With regards the Council's concern around the impacts of growth from Green Belt release on the highways and ability for sites to support sustainable infrastructure, the Council's housing topic paper identifies that those sites located away from town centres and transport corridor do not have ready access to services or public transport provision and do not contribute towards the critical mass to make shops and services more viable, and public transport and cycling measures viable and feasible. 3.4.15 It goes on to note that edge of town Green Belt sites have been promoted to the Council at circa 30-40 dwellings per hectare which is unlikely to sustain a bespoke services in the long term. However, the Transport Assessment Scoping document contradicts this statement noting that all of the Call for Site sites have the potential to be brought forward in a manner which would support active and sustainable transport measures and where the local impacts of associated transport demand could be accommodated and/or mitigated. In particular GB4 Land at Glebelands is noted to have access to bus routes 21 and 22, the nearest station is Benfleet, accessible by bus connection as well as having access to LCWIP corridors 1 and 1a and access to national highway junctions	It is clear from the discussion above that the Castle Point plan as currently presented is insufficient regarding housing delivery. The plan will only be making provision for approximately half of the standard methodology requirement and there is no evidence presented to demonstrate whilst the Council cannot deliver its full requirement and nor any agreed positions in terms of assistance from neighbouring authorities. 3.5.2 No significant amendments to the Green Belt boundaries are proposed despite assessment of the Green Belt boundaries finding 12 areas worthy of further consideration. 3.5.3 It is clear that this plan should not progress further as proposed the			Yes, Site Submission Profile for Land off Glebelands, Benfleet - Page 19 of PDF	B	The Plan does not plan for the Council's required housing need as calculated by the Standard Methodology and enshrined in national planning policy. Promotes land at Glebelands. Argues Green Belt boundaries should have been released and changed.	Housing need, including standard method, considered through the supporting evidence. Green Belt/Grey belt covered under policy GB2.	N

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								meeting this requirement is not satisfactory nor sufficiently evidenced by the Council. 1.1.6 Gladman is promoting land in Benfleet through the emerging Castle Point Plan. This concerns land at Glebelands which is suitable for approximately 165 dwellings (the Site). The Site is available, suitable, and deliverable for			8 and 14. This indicates that one the sites will be able to utilise the existing public transport and sustainable modes of travel in the area and through their patronage keep these services operating and secondly the individual schemes can address potential impacts on the highway network which may arise. This does not provide strong reasoning for the Council to not amend the Green Belt based on the capacity of the highways network. 3.4.17 Castle Point has a demonstrable unmet need for housing in light of the lack of a five-year housing land supply. Therefore development of Green Belt land that does not have any undue impacts on the wider countryside and Green Belt around and that the site should be considered for development, where it does not make a strong contribution to any one of purposes (a), (b), or (d) of the Green Belt purposes outlined in paragraph 143 of the NPPF. Subsequently this land in Castle Point is defined as Grey Belt if brought forward in a sustainable manner in accordance with national policy with reference to paragraphs 110 and 115 of the NPPF and also complies with the Golden Rules in accordance with Affordable Housing, Infrastructure and Green Spaces requirements as set out in national and local	Council must first evidence should be presented of the joint working to date to satisfy the requirements of the duty to cooperate, and sites should be identified after further consideration of the 12 areas identified by the Green Belt, this may be either option 2A or 2B from the SA of Policy SP3.										

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								housing as summarised in Section 5 of this representation. For the purposes of the Local Plan 2026 – 2043 this is an omission site despite the previous plan making history set out in Section 2 and the sites suitability for the reasons set out therein. 1.1.7 Amendments to Green Belt boundaries are necessary in order to deliver sustainable			planning policy. The NPPF goes on at paragraph 116 to state that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.” 3.4.19 It is clear from the Council’s own assessments that there would not be a severe impact upon the local highway network from identified growth options and there is no reason to prevent development on these grounds. 3.4.20 The above demonstrates that there are exceptional circumstances to support amendments to the Green Belt boundaries. The approach by the Council is fundamentally unsound and is not supported by its own evidence base. The Local Plan strategy should be revisited at and the Green Belt boundaries amended to support additional location that will increase the supply of both market and affordable homes or it can only be found unsound.										

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								development in the Borough and land off Glebelands should be removed the Green Belt for the reasons set out in the Council's own evidence base supporting the Plan. 3.4.1 The plan seeks to provide for a minimum of 6,196 homes over the plan period to 2034, at an average of 364 dwellings per annum. This falls significantly											

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								short of the current standard methodology target of 686 dwellings per annum. This policy is not sound, not positively prepared and inconsistent with national policy. 3.4.2 The national situation is set out concisely in a letter from Baroness Taylor, the Parliamentary Under Secretary of State at the Ministry of Housing, Commu											

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								nities and The Castle Point Plan 2026-2043 Regulation 19 Draft July - September 2025 10 Local Government to Cotswold District Council in August 20252, regarding the Council's "deep concerns" over revised housing targets for the district, which states: "...we are in the middle of one of the most acute housing crises in living											

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								memory. Home ownership is out of reach for too many, too few homes are built and even fewer are genuinely affordable.' 3.4.3 The letter goes on to state: 'all areas of the country must play their part in building the homes we need. The Government expects local authorities to explore all options to deliver the											

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								homes their communities need: maximising brownfield land, working with neighbouring authorities, and, where necessary, reviewing Green Belt. Each authority is expected to assess and plan how to meet its local housing needs over the plan period.'												
								3.4.4 It is clear that Castle Point has also failed in such an approach and not												

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								playing its part in trying to deliver the homes the country and the local area needs. It is failing to deliver for its own residents and demonstrating effective work with its neighbours, to pursue the findings of this plans supporting Green Belt review and to deliver the housing needs of the Borough in accordance with national											

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								policy. 3.4.5 The steps needed to release and change Green Belt boundaries is set out within paragraph 145, 146 and 147 of the NPPF. NPPF paragraph 145 states that once established Green Belt boundaries should only be altered where exceptional circumstances are full evidenced and justified through the											

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								preparation or updating of plans. Paragraph 146 goes on to state that these exceptional circumstances can include, but are not limited to, an authority not being able to meet its identified needs for homes, commercial or other development through other means. If these exceptional circumstances exist, then authorities should											

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								review the Green Belt boundaries in order to meet the needs in full. Paragraph 147 of the NPPF sets out the criteria which authorities assess before concluding that exceptional circumstances exist to justify the change in Green Belt boundaries. This includes demonstrating that it has examined fully all other reasonable options											

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								for meeting its identified need for development. The first and second require the 2 Letter from MHCLG to Cotswold District Council (18th August 2025) 11 Council to demonstrate that the strategy makes as much use as possible of suitable brownfield sites and underutilised land. The Council's own consultation											

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								document makes clear that the strategy being put forward relies heavily on the use of brownfield land as it focuses development within the urban area. The third criteria, requires the strategy to have been informed by discussions with neighbouring authorities about the accommodation of growth through a statement of											

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								common ground. As identified earlier within these representations there has been no evidence provided that there have been meaningful discussions with neighbouring authorities and there is no statement of common ground provided. Whilst there is no objection to deliver housing on brownfield sites, the NPPF does not support											

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								a brownfield first policy and sites other than brownfield are required in order to deliver the Borough's housing needs as identified by the Council's own assessments (in that it is only seeking to deliver around half of the Standard Method's requirements). 3.4.8 It is clear therefore that exceptional circumstances exist,											

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								and the Green Belt boundaries should be amended to ensure that the full housing requirement is met. 3.4.9 There is one more step which needs to be taken when assessing whether Green Belt boundaries should be altered. Paragraph 146 adds the caveat that if a Green Belt review demonstrates that changes											

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								would fundamentally undermine the purposes (taken together) of the remaining Green Belt this may also justify a reduction in meeting the housing needs in full. 3.4.10 Despite this evidence of overwhelming housing need and lack of impacts upon the strategic function of the Green Belt, the Council has elected not to alter the Green Belt boundaries											

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								es. 3.4.11 Castle Point should meet it's housing target as calculated by the Standard Method as required national policy. Therefore sustainable Green Belt release will be required to meet the housing requirement where this Green Belt does not prevent urban sprawl, prevent neighbouring towns from merging and preserve											

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								the setting and special character of historic towns. As previously identified in the preceding section, the Council's own Green Belt assessment has assessed parcels of Green Belt capable of release without undermining the remaining Green Belt and its strategic functions. 3.4.12 The justification given by the Council in the											

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								supporting text to SP3 is identified that achieving the total housing target "would significantly and irreversibly destroy large tracks of Green Belt, including land which strongly contributes to the Green Belt purposes, and undermine the approach to protected and enhancing the natural environment." It goes on to note that "transport											

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								modelling has shown that the road network in Castle Point, operates at capacity already, and the impacts of growth would be severe. It has also been demonstrated that there are sustainable accessibility and accessibility issues with sites within the Green Belt that would act to worsen this situation without being able to provide the											

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								levels of mitigation necessary to reduce impacts on the strategic road network". This is supported by the Housing Capacity Topic Paper which identifies other footnote 7 constraints, biodiversity designations under the NERC Act, flood risk, open space deficit and heritage considerations.											

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0994-0001	Agent	Barry	Veater	Govresources Ltd OBO Barry Veater	Yes	SP3	Yes		No	Consistent with national policy	<p>Despite supporting Policy SP2 - Making Efficient Use of Urban Land and Creating Sustainable Places, the Policy SP3 shortfall in projected housing provision of 5466 homes over the plan period, is so far from being consistent with national policy that the Plan is likely to fall very early in the Examination process, if indeed it gets that far.</p> <p>The District is very tightly constrained by water/marshes, protected sites, and Green Belt Land, however a single Green Belt release in NW Thundersley, with appropriate infrastructure and improvements to the remaining Green Belt land warrants more investigation.</p> <p>The potential intensification of urban sites and brownfield development must ensure that sufficient space remains for employment use and commercial space.</p>	Policy SP3 should include one suitable Green Belt site, the least potentially damaging possible site, to raise the likelihood of the Castle Point Plan proceeding to adoption and thereby providing a plan-led approach to development in Castle Point.	No	Not Answered	Not Answered	A	<p>Despite supporting Policy SP2 - Making Efficient Use of Urban Land and Creating Sustainable Places, the Policy SP3 shortfall in projected housing provision of 5466 homes over the plan period, is so far from being consistent with national policy that the Plan is likely to fall very early in the Examination process, if indeed it gets that far.</p> <p>The District is very tightly constrained by water/marshes, protected sites, and Green Belt Land, however a single Green Belt release in NW Thundersley, with appropriate infrastructure and improvements to the remaining Green Belt land warrants more investigation.</p>	Noted	N

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																	The potential intensification of urban sites and brownfield development must ensure that sufficient space remains for employment use and commercial space.		
09920001	Agent	Timothy	Manna	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Hillside Enterprises have submitted an outline planning application for up to 160 dwellings at land at Solby Wood Farm, Daws Heath and are promoting the site through the Local Plan. It is considered that the Draft Local Plan does not meet the needs of the area in meeting its significant housing need due to its failure to release Green Belt land, thus failing the test of 'soundness' as listed within Paragraph 64 of the NPPF (2024). We would urge Castle Point to reconsider their approach to meeting development needs and the Green Belt to ensure that the needs for the Borough are met. This policy sets out that The Castle Point Local Plan will deliver a minimum of 6,196 new homes over the period 2026-2043. Paragraph 6.50 then goes on to say that this will be achieved by, 'at a minimum of 209 new homes per year for the years 2026-31 (years 1 to 5), increasing to 253 new homes per year for 2031-2036 (years 6-10) at least 554 homes per year from 2031-43 (years 11 to 17).' Notwithstanding this, the		No	Not Answered	Yes	B - see additional supporting evidence	Hillside Enterprises have submitted an outline planning application for up to 160 dwellings at land at Solby Wood Farm, Daws Heath and are promoting the site through the Local Plan. It is considered that the Draft Local Plan does not meet the needs of the area in meeting its significant housing need due to its failure to release Green Belt land, thus failing the test of 'soundness' as listed within Paragraph 64 of the NPPF (2024). We would urge Castle Point to reconsider their approach to meeting development needs and the	Noted	N

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											<p>Draft Local Plan acknowledges that the current target for Castle Point as established using the standard methodology set out in the revised NPPF (2024) is 11,662 homes over the plan period, equating to 686 new dwellings per annum. Whilst it is acknowledged that Castle Point references the reasons as to why they cannot achieve the standard methodology number, this goes against the Government's objective of significantly boosting the supply of homes and indeed, Paragraph 62 of the NPPF (2024) which makes it clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in National Planning Practice Guidance. The Brook Farm Appeal (ref: APP/M1520/W/24/3351658) found that the Council could not demonstrate a five year supply of deliverable housing sites, with a supply between 0.55 and 0.69 years, demonstrating that Castle Point's current projected housing figure falls significantly below the requirements. Further, the proposed development within Policy SP3 states that almost half of all new homes within the plan period will be delivered within Canvey Island, which is considered to be an unsustainable approach to development and does not</p>							<p>Green Belt to ensure that the needs for the Borough are met. This policy sets out that The Castle Point Local Plan will deliver a minimum of 6,196 new homes over the period 2026-2043. Paragraph 6.50 then goes on to say that this will be achieved by, 'at a minimum of 209 new homes per year for the years 2026-31 (years 1 to 5), increasing to 253 new homes per year for 2031-2036 (years 6-10) at least 554 homes per year from 2031-43 (years 11 to 17).'</p> <p>Notwithstanding this, the Draft Local Plan acknowledges that the current target for Castle Point as established using the standard methodology set out in the revised NPPF (2024) is 11,662 homes over the</p>		

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											accord with Paragraph 61 of the NPPF (2024) which requires a 'variety of land' to deliver a sufficient supply of homes.						plan period, equating to 686 new dwellings per annum. Whilst it is acknowledged that Castle Point references the reasons as to why they cannot achieve the standard methodology number, this goes against the Government's objective of significantly boosting the supply of homes and indeed, Paragraph 62 of the NPPF (2024) which makes it clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in National Planning Practice Guidance. The Brook Farm Appeal (ref: APP/M1520/W/24/3351658) found that the		

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																	<p>Council could not demonstrate a five year supply of deliverable housing sites, with a supply between 0.55 and 0.69 years, demonstrating that Castle Point's current projected housing figure falls significantly below the requirements. Further, the proposed development within Policy SP3 states that almost half of all new homes within the plan period will be delivered within Canvey Island, which is considered to be an unsustainable approach to development and does not accord with Paragraph 61 of the NPPF (2024) which requires a 'variety of land' to deliver a sufficient supply of homes.</p>		

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0992-0002	Agent	Timothy	Manna	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	The council's Green Belt Assessment identified that land at Solby Wood Farm contributed strongly to the purposes of the Green Belt. However, we would urge Castle Point to reconsider the site as a sustainable Grey Belt residential allocation. At the national level, the assessment and potential reclassification of Green Belt is directed by the NPPF and PPG, which provide the statutory framework for designation and introduce the concept of 'Grey Belt'. The key policy test is whether the release of land would undermine the five purposes of the Green Belt, with Purposes (c) and (e) generally excluded from localised appraisals. The recent Castle Point Green Belt Assessment (GBA, 2025) applies this framework to sub-area GB 11: South West of Daws Heath, within which the Site lies. The GBA assesses GB 11 as making a Strong contribution to Purpose (a) and a Moderate contribution to Purpose (b). However, further analysis shows these contributions are overstated. For example, the sub-area is already physically well-contained by Ancient Woodland and neighbouring settlements, meaning any development would follow a logical and defined edge rather than constituting unrestricted sprawl. Moreover, Daws Heath is consistently defined by the Council as a village rather		No	Not Answered	Yes	B - see additional supporting evidence	The council's Green Belt Assessment identified that land at Solby Wood Farm contributed strongly to the purposes of the Green Belt. However, we would urge Castle Point to reconsider the site as a sustainable Grey Belt residential allocation. At the national level, the assessment and potential reclassification of Green Belt is directed by the NPPF and PPG, which provide the statutory framework for designation and introduce the concept of 'Grey Belt'. The key policy test is whether the release of land would undermine the five purposes of the Green Belt, with Purposes (c) and (e) generally excluded from localised appraisals. The recent Castle	Noted	N

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											<p>than a town, limiting the applicability of Purpose (b). Lastly, Purpose (d) is excluded from the GBA and therefore offers no contribution to the assessment of GB 11. When aligned with the NPPF purposes however, the Site does not perform strongly against Purposes (a), (b) or (d), ultimately supporting its reclassification as potential Grey Belt land.</p> <p>Evidence from adjacent Parcels 4 and 8 shows that existing development has already weakened their contribution to the Green Belt purposes, reinforcing the limited impact that development of GB 11 would have. The GBA ultimately concludes that releasing GB 11 would be unlikely to cause significant harm to the wider Green Belt due to its contained nature and separation from the main network. The Proposed Development would not therefore fundamentally compromise the wider Green Belt function. On this basis, GB 11 should be regarded as a potential Grey Belt candidate, consistent with national policy and guidance.</p> <p>Response to Green Belt Assessment relating to Land at Solby Wood Farm, Daws Heath The Site has been assessed under the updated PPG methodology and found to make only a Moderate to Weak Contribution to Green Belt Purpose (a) and a Weak or No Contribution to</p>											Point Green Belt Assessment (GBA, 2025) applies this framework to sub-area GB 11: South West of Daws Heath, within which the Site lies. The GBA assesses GB 11 as making a Strong contribution to Purpose (a) and a Moderate contribution to Purpose (b). However, further analysis shows these contributions are overstated. For example, the sub-area is already physically well-contained by Ancient Woodland and neighbouring settlements, meaning any development would follow a logical and defined edge rather than constituting unrestricted sprawl. Moreover, Daws Heath is consistently defined by the Council as a		

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											Purposes (b) and (d). As such, it does not fulfil a strong Green Belt function.						village rather than a town, limiting the applicability of Purpose (b). Lastly, Purpose (d) is excluded from the GBA and therefore offers no contribution to the assessment of GB 11. When aligned with the NPPF purposes however, the Site does not perform strongly against Purposes (a), (b) or (d), ultimately supporting its reclassification as potential Grey Belt land. Evidence from adjacent Parcels 4 and 8 shows that existing development has already weakened their contribution to the Green Belt purposes, reinforcing the limited impact that development of GB 11 would have. The GBA ultimately concludes that releasing GB 11 would be unlikely to cause significant harm		

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																	to the wider Green Belt due to its contained nature and separation from the main network. The Proposed Development would not therefore fundamentally compromise the wider Green Belt function. On this basis, GB 11 should be regarded as a potential Grey Belt candidate, consistent with national policy and guidance. Response to Green Belt Assessment relating to Land at Solby Wood Farm, Daws Heath The Site has been assessed under the updated PPG methodology and found to make only a Moderate to Weak Contribution to Green Belt Purpose (a) and a Weak or No Contribution to Purposes (b) and (d). As such, it does not fulfil		

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																	a strong Green Belt function.		
09920003	Agent	Timothy	Manna	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Justified	Paragraphs 6.54 and 6.55 indicate that the road network and health service provision within Castle Point are at capacity and that the Authority will not be able to accommodate any growth within these areas. We would question this approach taken by Castle Point, especially as the Transport Assessment (July 2025) has indicated that whilst some junctions within the Authority are congested, it does not state that the whole road network is at capacity and outlines methods for improvements within the various road networks of Castle Point. The Health Impact Assessment (July 2025) outlines that Policy SP4 Development Contributions facilitates contributions to strategic infrastructure and that improving health and wellbeing outcomes for residents and visitors is crucial. Taking the above into account, it is considered that paragraphs 6.54 and 6.55 contradict the evidence base.		No	Not Answered	Yes	B - see additional supporting evidence	Concern that that Paragraphs 6.54 and 6.55 indicate that the road network and health service provision within Castle Point are at capacity and that the Authority will not be able to accommodate any growth within these areas when the Transport Assessment (July 2025) has indicated that whilst some junctions within the Authority are congested, it does not state that the whole road network is at capacity and outlines methods for improvements within the	The last sentence of the paragraph at 6.55 states that "This constraint is therefore a barrier to growth beyond that identified in this Plan". This explains why the transport assessment identifies mitigation for the amount of homes delivered in the plan and the health impact assessment considers the contributions to the health and well being of residents to be crucial to deliver the amount of homes within the plan.	N

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																	various road networks of Castle Point. Also the Health Impact Assessment (July 2025) outlines that Policy SP4 Development Contributions facilitates contributions to strategic infrastructure and that improving health and wellbeing outcomes for residents and visitors is crucial.		

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10200003	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SP3	No		No	Positively prepared, Justified, Effective, Consistent with national policy	<p>This policy proposes that over the plan period of 2026 to 2043 6,196 new homes will be delivered. This is a capacity based housing requirement and falls short of meeting assessed housing needs by nearly 5,500 homes. The reason for this significant shortfall in supply of new homes is the Council's decision not to amend Green Belt boundaries and focus solely on delivering development in the urban area – and in particular Canvey Island where over half of all new homes are expected to be built. The justification being given by the Council for this approach is to protect the important role played by the Green Belt in Castle Point not only in delivering the purposes of the Green Belt but also in providing green infrastructure both locally and sub-regionally.</p> <p>HBF disagrees with the Council's strategy and does not consider the approach taken by the council with regard to the delivery of development to be consistent with national policy, justified or effective. Our concerns are explored in more detail below.</p> <p>Paragraph 145 of the NPPF states that “once established Green Belt boundaries should only be altered in exceptional circumstances”. Paragraph 146 provides more detail on exceptional circumstances stating that they “include but</p>		Yes	Not Answered	Yes	A	<p>Objects to the shortfall in supply of new homes. Objects to the Council's decision not to amend Green Belt boundaries and focus solely on delivering development in the urban area – and in particular Canvey Island where over half of all new homes are expected to be built. HBF disagrees with the Council's strategy and does not consider the approach taken by the council with regard to the delivery of development to be consistent with national policy, justified or effective. Our concerns are explored in more detail below. HBF are also concerned that there has been a lack of any sequential testing of the flood risk with regard to this site and other larger sites in the Green Belt.</p>	<p><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.</p> <p><u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.</p> <p><u>Sequential and</u></p>	N

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											<p>are not limited to, instances where an authority cannot meet its identified need for homes, commercial or development through other means". Paragraph 146 goes on to say that if that is the case then authorities should review Green Belt boundaries and propose alterations to meet those needs in full unless the review provides clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt. However, before concluding that there are exceptional circumstances the paragraph 147 requires Councils to show that they have made as much use of brown field land as possible, optimised density of development and had discussions with neighbouring authorities to ascertain whether they could meet any other housing needs.</p> <p>Turning first to paragraph 147. The Councils evidence shows that it cannot meet its housing needs in full de-spite making as much use of brownfield land as possible. In fact, HBF considers the evidence as to the ability of some of the allocated site to deliver the number of homes suggested to be unjustified – a point we will return to later on in our representations – and adds weight to the need for Green Belt release in Castle Point. As for whether the council has had discussion with neighbouring areas</p>						<p>PPG states at paragraph 7-023 with regard to the sequential test: NERC Act Requirements and "Strategic Creation Opportunities" Object to the Plan's approach.</p> <p>Protecting public open space: HBF object to the Council's reference to shortfalls in Borough wide open space, as any loss can be mitigated.</p> <p>Sustainable Access:The Council have prepared a Transport Assessment for the urban sites identified in the Castle Point Local Plan. There would appear to be contradictions with the Council's position that it would not be possible to address the impact arising from any of the potential</p>	<p>Exception Test for Flood Risk is covered in the SFRA, which will be supported by further clarifications.</p> <p>Green Belt/Grey Belt Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments.</p>	

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											<p>accommodating some of Castle Point's needs it is difficult to say as no evidence on the duty to co-operate has been provided. Reference is made to the duty in paragraph 3.2 of the Housing Capacity Topic Paper, but this simply states there were discussions on the outcomes of the issues and options consultation. Our assumption is that no offers have been made as nothing is mentioned in the local plan. However, as we mention earlier in these representations the Council will still need to set out what engagement they have had with neighbouring authorities on unmet needs. If no discussion has taken place, then the Council will have failed in its duty to co-operate – an issue that cannot be resolved after the local plan has been submitted for examination.</p> <p>It is therefore justified for the Council to review its Green Belt and consider whether exceptional circumstances exist to support boundary amendments. As has been established there are unmet needs which are considered by the NPPF to be an exceptional circumstance that justifies Green Belt boundary amendments. Therefore, the only remaining consideration with regard to the Green Belt is whether the review provides clear evidence that doing so would fundamentally undermine the</p>						<p>development sites located in the Green Belt.</p> <p>Dispute Housing Capacity Topic Paper conclusion that none of the sites provide a critical mass to provide bespoke solutions in the long term and that the sustainable travel measures would not result in a shift to sustainable travel modes. Suggests this contradicts the Transport Assessment Scoping Document:</p> <p>Site specific constraints: Suggest they can be overcome and many green belt sites are preferable to allocated sites in respect of the sequential test.</p> <p>Conclusion on the housing requirement in SP3 HBF considers there to be exceptional circumstances</p>		

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											<p>purposes of the remaining Green Belt.</p> <p>The Council's Green Belt Boundary Assessment (GBA) identified 13 sub areas that overall perform either moderately or weakly against the purposes of Green Belt. Further to this the GBA also considered whether any of the parcels could be considered to be grey belt and concludes at paragraph 6.4.1 that 19 of the 31 sub areas assessed could be defined as grey belt. It would appear that the Council agrees with these conclusions in GB2 which states that those sites identified as grey belt in the GBA will not undermine the purposes of Green Belt. As such, the assumption must be that amendments can be made, at the very least at those locations considered to be grey belt, to the Green Belt boundary without fundamentally undermining its purposes.</p> <p>Yet despite this assessment the Council has chosen not to amend Green Belt boundaries due to a range of other issues set out in the Housing Capacity Topic Paper, such as other footnote 7 constraints, biodiversity designations under the NERC Act, flood risk, open space deficit, and heritage considerations. We consider these matters in turn below.</p> <p>Other footnote 7 constraints.</p>							to support amendments being made to Green Belt boundaries in Castle Point and that there are no strong reasons for restricting the overall scale of development to the level being proposed by the Council.		

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											<p>HBF accepts that where footnote 7 constraints exist the council should not be placing development in such locations, and these should be excluded from further consideration. However, these designations do not cover all of the development sites in the Green Belt submitted to the Council.</p> <p>NERC Act Requirements and “Strategic Creation Opportunities”</p> <p>The Council state that as part of the duty to conserve and enhance biodiversity placed on it by the Natural Environment and Rural Communities (NERC) Act 2006, as amended by the Environment Act 2021, requires them to set policies which further the general biodiversity objective and in doing so have regard to the LNRS. In this consideration the Council has made the decision to safeguard all land that has been mapped in the LNRS as being included in the strategic creation opportunity map. The Council state that these areas do not automatically require protection from development. However, the Council goes on to state that they are being safeguarded because they represent the 15% best opportunities for improving nature conservation. This is not correct. The LNRS states on page 30 that these areas</p>										

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											<p>“do not contain any areas of particular importance for biodiversity”. What they offer is for every biodiversity unit created in these locations they are eligible for a 15% uplift in the DEFRA biodiversity metric. As such there is no reason why these sites need to be protected as they are currently of no particular importance in terms of nature or biodiversity, do not need to be protect-ed from development and therefore do not provide a strong reason for not meeting development needs in full. In fact, the counter point to the Council’s argument is that without development there will be less opportunity to make improvements to biodiversity within these locations given that any improvements will principally be as a result of contributions from new development. By supporting more development through amendments to the Green Belt boundary the council would actually be enhancing biodiversity – a key aspect of their duty arising out of the NERC Act.</p> <p>Protecting public open space.</p> <p>The Council consider the existing deficit in open space and on the basis of the golden rules in paragraph 156 of the NPPF that would be perverse to permit development on such spaces. HBF would agree that it would be inconsistent with paragraph</p>										

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											<p>104 of the NPPF to allow development on public open space where this was not surplus or its loss would not be replaced. However, this is not an absolute constraint as any loss can be mitigated, and it does not affect all of the Green Belt. Therefore, whilst it is an important consideration as to where development might occur it does not prevent Council from amending Green Belt boundaries.</p> <p>The council have also seemingly misinterpreted the golden rules in paragraph 156 of the NPPF. The council set out in section two of the housing constraints topic paper that there is currently a significant deficit in open spaces across the district. This is a legitimate concern. However, rather than see this as a reason for not amending Green Belt boundaries HBF would suggest that the golden rules provide a reason for supporting amendments to the boundary as new development in these areas would ensure that there are more and im-proved open spaces in Castle Point.</p> <p>Sustainable Access</p> <p>The Council have prepared a Transport Assessment for the urban sites identified in the Castle Point Local Plan. In addition to this the Council have commissioned a site level sustainability and</p>										

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											<p>accessibility assessment for each of the Green Belt sites that could potentially be allocated through this local plan. While the results of this study are summarised in chapter 12 of the Housing Capacity Topic Paper, we could not find the study itself in the Council's evidence. However, looking at the evidence that has been included there would appear to be contradictions with the Council's position that it would not be possible to address the impact arising from any of the potential development sites located in the Green Belt.</p> <p>The Council's position is set out in paragraph 12.9 of the Housing Capacity Topic Paper. In brief the Council's conclusion in this paragraph is that none of the sites provide a critical mass to provide bespoke solutions in the long term and that the sustainable travel measures would not result in a shift to sustainable travel modes. This contrasts with the statement in paragraph 7.2.115 of the Transport Assessment Scoping Document which states with regard to the Green Belt sites submitted through the call for sites (CfS) that:</p> <p>"It is considered that all of the CfS sites have the potential to be brought forward in a manner which would support active and sustainable</p>											

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											<p>transport measures and where the local impacts of associated transport demand could be accommodated and/or mitigated". This would suggest that these sites could address the potential impacts on the highway network arising from their development. Given the significant shortfalls in housing need the Council should have been working proactively with the promoters of these sites and the highways authority to identify solutions that would have enabled these sites to come forward. Therefore, on the basis of the evidence presented there are no strong reasons as to why the Council should not amend Green Belt on the basis of traffic capacity. There is potential to mitigate the impacts arising from any additional allocations and ensure these sites are sustainable in the long term.</p> <p>Site specific constraints.</p> <p>In addition to the borough wide constraints considered by the Council an assessment has been made as to the site specific constraints such as heritage assets and flooding. However, these issues do not affect all of the sites in the Green Belt being promoted for development and even where they are present it is possible to mitigate an impact arising from these matters. What is most notable with regard to flooding is that the majority of</p>									

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											<p>the development proposed by the Council is on Canvey Island which is wholly within Flood Zone 3 compared to the majority of the submitted sites in the Green Belt, being in flood risk zone 1. In terms of the sequential test, it is clear that the sites in the Green Belt should be allocated prior to even considering those on Canvey Island.</p> <p>Conclusion on the housing requirement in SP3</p> <p>HBF considers there to be exceptional circumstances to support amendments being made to Green Belt boundaries in Castle Point and that there are no strong reasons for restricting the overall scale of development to the level being proposed by the Council. While there are constraints on development in Castle Point the evidence presented by the Council does not justify adopting the proposed spatial strategy which does not, despite the significant shortfall in market and affordable housing, release any land from the Green Belt. The approach taken by the Council fails to take a balanced approach in its consideration of the development needs versus environmental protection, placing significant weight on the latter and giving limited consideration to the benefits of meeting housing needs through the amendment of Green Belt boundary. It is HBFs opinion that the</p>										

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											<p>approach set out in SP3 means that the plan is fundamentally unsound. The only way to rectify this is through modifications that amend the Green Belt boundary to support additional locations that will increase the supply of both market and affordable homes.</p> <p>Housing trajectory and supply</p> <p>The Council have included a delivery trajectory in its Housing Topic paper but not within the Local Plan it-self which is not consistent with paragraph 78 of the NPPF which states that "... strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period". The local plan will therefore need to be modified to include a trajectory.</p> <p>The Council are proposing in policy SP3 to use stepped requirement to reflect the fact that the 70% of the new homes delivered in Castle Point will be built after 2036. This is indicative of the Council's spatial strategy which allocates a number of sites that are not currently available for development, such as allocation C4, and due to their complexity will require considerable work to bring forward. HBF accepts that on the basis of the Council's proposed spatial strategy a stepped trajectory is probably justified but</p>										

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											<p>considers it to be a re-reflection of an unsound spatial strategy that fails to take any account of the pressing need for new homes in Castle Point. As we note earlier in our representations, the need for new homes in Castle Point is not just in the future with housing needs assessment stating that there are currently 3,000 households who cannot afford to rent a home, yet despite this it is proposing that 70% of the homes built will not come forward for over ten years.</p> <p>HBF are also concerned that even the constrained housing supply proposed is not deliverable. In particular we are concerned that allocation C4 West Canvey is expected to deliver 2000 homes between 2036/37 and 2042/43 at an average rate of 250 dwellings per annum. Firstly, it is not clear whether this site is actually available for development on the basis that the assessment in the Strategic Land Availability Assessment (SLAA) from July 2025 states that this is still an unknown. Even if the site is available there are also concerns as to whether the site will deliver 2,000 homes within the plan period. Evidence on average build out rates published by Lichfields in their report Start to Finish show that for sites of this size indicate a lower quartile build out rate of 100 dpa and an upper quartile rate of 188 dpa.</p>													

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											<p>Some sites do build out more quickly but given the evidence on average rates it will be necessary for CPBC to provide evidence as to why they consider it possible for the site to deliver at 250 dpa. Without any further evidence the Council will need to reduce the number of homes that will come forward at West Canvey over the plan period.</p> <p>HBF are also concerned that there has been a lack of any sequential testing of the flood risk with regard to this site and other larger sites in the Green Belt. PPG states at paragraph 7-023 with regard to the sequential test:</p> <p>“The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the</p>													

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											<p>lowest risk areas, ...”</p> <p>The approach taken by the Council, which discounts Green Belt in lower risk areas has resulted in the majority of development being delivered on Canvey Island in flood zone 3a. HBF would question whether such a strategy is sound and indeed whether it is appropriate to allocate a site such as C4 given that there are alternative sites in lower flood risk areas. While these sites were discounted by the Council, and as such where not part of the sequential test, it is clear that many of the sites in Green Belt that were submitted for development are in lower areas of flood risk. ON the basis of the evidence provided HBF consider it highly likely that this site will not be delivered within the plan period. If this was the case, then the shortfall in housing land supply would be even more significant. Housing delivery would be reduced to 4,196 – a shortfall of circa 7,500 homes.</p> <p>HBF have similar concerns with the Manor Trading Estate, which is expected to deliver around 200 homes, yet the Council have no evidence that it is available and state that it is well occupied. In order to be considered developable the site must have a reasonable prospect that it will be available and without any evidence to show it will be</p>													

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											<p>available at the point envisaged it should not be included in the local plan. More evidence is needed for this site to be allocated the local plan.</p> <p>5 year housing land supply</p> <p>Based on the Council's housing trajectory in the Housing Topic Paper, the Council will not have a five year land supply on adoption. Appendix A of these representations (see attached letter) provide a rolling assessment of the Council's five year land supply using both the Sedgefield and the Liverpool methods. The assessment includes the requirements for the Council to show a 20% buffer in its housing land supply as set out in paragraph 78c) of the NPPF. This shows not only that the Council will not have a five year land supply on adoption but for the first six years of the plan period. On the basis of paragraph 11 footnote 8 the plan will be considered out of date from day it is adopted.</p> <p>Conclusion on land supply</p> <p>The Council will not have a five year housing land supply on adoption of this local plan and as such it must be considered unsound. In addition, there is no evidence as to the availability of West Canvey and Manor Estate which together are proposed to deliver 2,200 new homes over the plan period. Unless</p>												

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											new evidence ca be provided to show that they will be available they should not be allocated.								

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0332-0001	Agent	Corin	Williams	Iceni OBO The Inner London Group		SP3	No	Draft Policy SP3 sets out the overall levels of growth being planned for in the new Local Plan. It identifies a requirement to deliver a minimum of 6,196 net additional dwellings and 0 ha of employment land over the Plan period to 2043. The Spatial Strategy seeks to deliver the majority of homes in the later part of the plan								B	Promoting Site GB3Policy SP3The objectively assessed housing and employment need targets are far below what is required and expected by national policy.Considers that the most effective way to retain jobs in the borough is to create more opportunities for employment growth and as such consider that Policy SP3 should be amended to clearly identify what the employment land target is for different types of employment use (e.g. office use, general industrial use, storage and distribution use). Inner London also object to the assertion in the supporting text that there will be a surplus of employment land, particularly industrial land over the plan	Policy SP3Employment land requirements are stated in paragraph 6.36 'In terms of employment need, data on employment growth indicates that there will be a small surplus of employment land arising over the Plan period of circa 2ha. This is additional to 7.5ha of land that has extant planning consent for employment uses at West Canvey. This means there is a potential surplus of 9.5ha of employment land over the Plan period.' So it is not necessary to identify targets by employment use in the policy.SAGrey Belt is implicitly recognised in option 2a in it's title 'Release a limited number of approximately 5 Green/Grey Belt sites'. The explicit reference to grey belt distinguishes it from options 1, 3 and 4.The respondents' preference for option 2a is noted.	N

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								period, aiming to bring forward a brownfield register for sites, development masterplans for town centre sites and renew designated employment sites with a mix of uses comprising housing, industrial and commercial uses in accordance with relevant policies. 2.3 Whilst Inner London support the intentions of Policy SP3 to									period. <u>SA</u> Suggest there are significant inaccuracies and shortcomings in the evidence base used by the Council to inform the Local Plan development targets. As a result, the Sustainability Appraisal and its judgements on the relative merits of different development options are based on flawed and outdated data. This undermines the credibility of the Appraisal's conclusions and means the Local Plan cannot be considered justified or supported by a robust evidence base, as required by the NPPF. It is considered that in assessing Option 2a, the SA has given insufficient weight to the benefits of and the need to deliver new		

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								“support development needs” across the plan period, the objectively assessed housing and employment need targets are far below what is required and expected by national policy. As it stands, the draft plan only seeks to address 52% of the housing need calculated for the borough by the new Standard Method, with the									housing and employment growth. The SA also fails to appreciate that Grey Belt sites are, by definition, of a lower environmental / ecological quality than Green Belt sites by virtue of Footnote 7 of the NPPF which does not allow parcels to be classified as Grey Belt if its constraints provide a “strong reason for refusing the development proposed” (Para 11d (i) NPPF 2024). Given the more limited constraints associated with Grey Belt land, it is considered that any potential environmental impacts can be effectively mitigated via S106 contributions. The exclusive reliance on brownfield land within Option 1 delivers only half of the borough’s		

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								supporting evidence providing insufficient reasons as to why a population of nearly 90,000 people will generate a 0ha employment need over the next 20 years.2.4 Paragraph 3.9 of the draft plan states that the current value of the local economy is around £1.1bn. This equates to a GVA of around £20,500 per working age									housing requirement and is founded on flawed and outdated evidence. By contrast, Option 2a offers a more balanced and deliverable strategy, enabling the release of limited Grey Belt sites (such as Land South of Charfleets) that are less environmentally constrained, well-related to the borough's most sustainable settlement, and capable of accommodating both housing and employment growth.		

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								person which the plan highlights is "significantly below the Essex and national averages". Paragraph 3.11 also states that despite the high work participation percentage of 87.9%, the commuter ratio stands at 54% meaning that most people need to commute outside the borough to secure higher wages which											

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								can be obtained elsewhere within the Southend and Brentwood Travel-to-Work Area.2.5 Inner London consider that the most effective way to retain jobs in the borough is to create more opportunities for employment growth and as such consider that Policy SP3 should be amended to clearly identify what the employment land											

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								target is for different types of employment use (e.g. office use, general industrial use, storage and distribution use). Greater clarity is also required on how the council will "ensure that there is sufficient employment land and commercial floorspace" without having an employment floorspace target against which delivery can be											

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								measured. For this reason, the plan cannot be considered positively prepared and in line with national policy.2.6 Inner London also object to the assertion in the supporting text that there will be a surplus of employment land, particularly industrial land over the plan period. Paragraph 6.36 states that “data on employ											

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								ment growth indicates that there will be a small surplus of employment land arising over the plan period of circa 2ha and that this, added to the extant planning consent for a 7.5ha employment scheme at West Canvey, has the potential to result in an overall surplus of 9.5ha of employment land over the plan period". 2.7 Contrary											

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								to the findings of the Local Plan Evidence, Icenis review local commercial property market dynamics (attached at Appendix A) reveals a critical shortage of industrial space in Castle Point rather than a surplus. It finds that, as of September 2025, the industrial vacancy rate in Castle Point is a very low 1.7% which is significantly											

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								below Essex (7.0%) and the UK (5.5%). An optimal vacancy rate for a healthy industrial market is typically 5-10% to allow for market churn and business expansion.2.8 This low vacancy rate indicates high demand for industrial floorspace in Castle Point and suggests that that current and previous market activity has been suppressed due											

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								to a lack of supply, a trend that has persisted historically, except for a brief rise in 2023. Currently, there are only 8 available industrial properties across the district, totalling 4,800 sq.m., with a majority being pre-1985 and unlikely to meet modern occupier requirements. There is a distinct lack of modern stock, especiall											

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								y for mid-sized businesses, with only one modern unit built in 2020 at Amber Industrial Park. The Thamesview 130 development is close to completing and is nearly fully let – showing that more modern employment space within the borough is in demand. 2.9 Based on a 10-year trend of average industrial net absorption, Icen's analysis suggests												

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								an industrial need of 11.9ha for Castle Point for the 2023-43 period, including a 5-year buffer, contrasting sharply with the draft Local Plan's projected surplus. 2.10 The economics note concludes that the Employment Topic Paper's reliance on a baseline labour demand model alone has likely significantly underestimated											

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								the need for employment floorspace, particularly for industrial uses, and therefore is neither justified or positively prepared as per paragraph 36 of the NPPF. It states that planning for additional modern business space, which is sustainable and capable of accommodating automation and modern business needs, is crucial for											

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								economic growth and diversification in Castle Point and that the current stock restricts inward investment and, by extension, the economic prospects of the wider authority and its residents.											