



Representations and Responses to the Castle Point Plan

January 2026

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So un d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 0 5 6- 0 0 1	Agent	.	.	Thorn ey Bay Park Limit ed c/o Laiste r Plann ing Limit ed	Yes	Poli cies Ma p	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 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 Proposals Map should be updated accordingly to remove the 'Green Lung' designation and retain the 'Park Homes' designation only. Otherwise, the Local Plan is unjustified and ineffective - and therefore 'unsound' - without further amendment.	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 removed from this part of the caravan park, and this land should only be designated 'Park Homes' alongside the wider caravan site	No	Not Ans wer ed	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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1 0 9 7- 0 0 0 1	Agent	.	.	Cove UK c/o Laiste r Plann ing Limit ed	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	Please remove land east of Kings Park Village from the Green Belt and allocate it for up to 50 residential park homes	Yes	Not Ans wer ed	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	N

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											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 the site is deliverable having regard to guidance in the Planning Practice Guidance (PPG). 8.1 Laister Planning Limited has been instructed by Cove UK, to submit a representation to Castle Point							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule	

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											Borough Council for the development of Land East of Kings Park Village (currently adjacent to Canvey Heights Country Park). 8.2 The proposal for this site would a provide a park home (static caravan) development for elderly persons by extending the existing caravan park known as King’s Park Village. 8.3 The site is located on the edge of Canvey Island which is classified as a large settlement within the borough of Castle Point, providing a good range of goods and services. The settlement is located south of South Benfleet and Hadleigh, with good road access via the B1014 and A130, offering a wider range of services and employment opportunities. 8.4 The Council previously concluded that the land performed poorly in Green							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	

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											Belt terms, and proceeded to allocate the site for caravan-based residential development in the previous 2018 Local Plan. An Inspector found that the proposed allocation was “sound”, subject to minor modifications. Unfortunately that Local Plan did not proceed towards adoption. However, as set out in this report, there are no changes to the site’s characteristics or national policy that would indicate that the previous proposed allocation should not be re-iterated with this new emerging Local Plan. The site remains suitable for residential development. 8.5 There is a clear demand for housing allocations, with the present emerging Local Plan allocating insufficient land to meet the identified needs. There is								under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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											also clear guidance that the Council should be allocated sufficient land for specialist housing needs for the elderly, including homes that facilitate independent living. The land east of King’s Park Village is a suitable location. 8.6 Indeed, the site is "deliverable" within the context of the Government's guidance. That is to say that it is "suitable", "available" and "achievable". It should have been included within SLAA for residential development, to assist with the preparation of a new LP for Castle Point. 8.7 It is suitable because the caravan site falls within the NPPF definition as a Grey Belt, following the change in government and the new designation of								

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											Grey Belt land. It is therefore desirable to use it for alternative purposes, so long as the development can be made sustainable. This report demonstrates that the proposals can comply with the NPPF and would be a form of sustainable development. There are no environmental or physical constraints to the site that would prevent its use for residential purposes, and it is not presently allocated for some other use. 8.8 The Grey Belt site would benefit from the relevant NPPF policies regarding it development, where there is a need to find land for housing. 8.10 The site is also "achievable", as it is already adjacent to a caravan park and there are no obvious viability constraints for its use as a								

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											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. 8.11 In conclusion, the site proposed should be allocated as it represents a sustainable Grey Belt site that can be developed quickly and easily to assist in meeting the Council's requirements for a variety of housing options. The previous proposed allocation for the site should be re-iterated in this Local Plan, to make this plan “sound”. As otherwise, the Local Plan is neither justified nor consistent with national policy and should be considered “unsound”. 8.12 Laister requests that the Council deallocate								

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											the land east of King's Park Village from the Green Belt and allocate this land for housing. It should also inset the former draft Policy HO31 from the								
0 8 2 3- 0 0 0 1	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	SP1	Yes		Yes		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	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.	No	Not Ans wer ed	Not Ans were d	A	Support policy SP1	Support noted.	N

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											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.	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.							
0 8 2 3- 0 0 0 2	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	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	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	No	Not Ans wer ed		A	Encourages liason with the environment agency at the earliest opportunity	Comments noted. Please see modifications to policy C8	N

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											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 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.	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.							
0 8 2 3- 0 0 0 3	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	SP4	Yes		Yes		We are pleased to see that flood and water management is included in the list of infrastructure where developer contributions may be required. We welcome the proposal that s106 agreements and	We are pleased to see that flood and water management is included in the list of infrastructure where developer contributions may be required. We welcome the proposal that s106 agreements and CIL charges could be used to fund flood infrastructure. We also welcome the statement that ‘[planning] permission [will] only granted if [there is a]	No	Not Ans wer ed		A	Supports policy SP4	Support noted	N

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											CIL charges could be used to fund flood infrastructure.We also welcome the statement that ‘[planning] permission [will] only granted if [there is a] demonstration of sufficient infrastructure capacity, including wastewater utility.’ It is important that wastewater provision is available to support growth and prevent environmental harm to the water environment.	demonstration of sufficient infrastructure capacity, including wastewater utility.’ It is important that wastewater provision is available to support growth and prevent environmental harm to the water environment.							
0 8 2 3- 0 0 0 4	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	Can vey Isla nd	Yes		Yes		Paragraph 8.26 – We welcome the Council’s commitment to develop a Riverside Strategy with the Environment Agency and other partners and to confirm that the Masterplan for the Seafront Entertainment Area will need to reflect this Strategy.Paragraph 8.30 - We welcome the Council’s	Paragraph 8.26 – We welcome the Council’s commitment to develop a Riverside Strategy with the Environment Agency and other partners and to confirm that the Masterplan for the Seafront Entertainment Area will need to reflect this Strategy. Paragraph 8.30 - We welcome the Council’s reference, in the context of Port-related development, to the safeguarded area for protecting future flood defence infrastructure improvement and maintenance interests.	No	Not Ans wer ed		A	Supports the text in paragraphs 8.26 and 8.30	Support noted.	N

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											reference, in the context of Port-related development, to the safeguarded area for protecting future flooddefence infrastructure improvement and maintenance interests.								
0 8 2 3- 0 0 0 5	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	C2	Yes		Yes		Paragraph 8.25 - Refers to the work being undertaken to the flood defences to enhance this area and offer ongoing flood protection. We support the inclusion of this section, however this work is now complete and therefore the text is out of date.We feel it could be replaced with the following “The seafront sits behind the Canvey Island sea defences which have recently benefitted from the Environment Agency’s multi-million pound investment of central government funding to maintain the defences’ high level of tidal flood	Paragraph 8.25 - Refers to the work being undertaken to the flood defences to enhance this area and offer ongoing flood protection. We support the inclusion of this section, however this work is now complete and therefore the text is out of date.We feel it could be replaced with the following “The seafront sits behind the Canvey Island sea defences which have recently benefitted from the Environment Agency’s multi-million pound investment of central government funding to maintain the defences’ high level of tidal flood risk management work and deal with the impact of rising sea levels”	No	Not Ans wer ed		A	Supports the policy but makes suggestion to correct that the works to the sea defences have now been completed “Theseafront sits behind the Canvey Island sea defences which have recently benefitted from the Environment Agency’s multi-million pound investment of central government funding to maintain the defences’ high level of tidal flood risk	See modifications proposed	8.25 The seafront sits behind the Canvey Island sea defences which are undergoing enhanced work to increase their protection and deal with the impact of rising sea levels-have recently benefitted from the Environment Agency’s multi-million pound

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											risk management work and deal with the impact of rising sea levels”						management work and deal with the impact of rising sea levels”		investme nt of central governm ent funding to maintain the defences ' high level of tidal flood risk manage ment work and deal with the impact of rising sea levels.
0 8 2 3- 0 0 0 6	Organisation	Pat	Abbott	Environment Agency	Yes	C4	Yes		Yes		We feel that some text should be incorporated into point 3 or point 6, to recognise the need for the Council and developers to provide adequate space for future maintenance activities relating to the two main river watercourses (Charfleets Dyke and Sluice Farm Dyke) within the Master planning requirements for this land allocation. Master Planning	We feel that some text should be incorporated into point 3 or point 6, to recognise the need for the Council and developers to provide adequate space for future maintenance activities relating to the two main river watercourses (Charfleets Dyke and Sluice Farm Dyke) within the Master planning requirements for this land allocation. Master Planning and re-development may provide opportunities to improve flood risk associated with the conveyance of Charfleets Dyke (especially within the Charfleets Industrial Estate) which has historically suffered from landowner culverting. Paragraph 172c of the NPPF advocates the taking of opportunities provided by new development and	No	Not Answered		A	Wants to take the opportunity to ensure adequate space is provided for future maintenance of the two main watercourses (Charfleets Dyke and Sluice Farm Dyke). Recommends aspirations for improved flood risk associated with the	Comments noted, see modifications proposed.	3. Improved public realm which prioritise s pedestrian movements and creates spaces for community, civic and business activities. The public realm strategy

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											and re- development may provide opportunities to improve flood risk associated with the conveyance of Charfleets Dyke (especially within the Charfleets Industrial Estate) which has historically suffered from landowner culverting. Paragraph 172c of the NPPF advocates the taking of opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding. The policy and supporting text could recognise and aspire to the inclusion of this as an opportunity, perhaps within the body of Points 3 or Point 6 of Policy C4 – West Canvey. The council need to consider the challenges of overlapping timeframes will	improvements in green and other infrastructure to reduce the causes and impacts of flooding. The policy and supporting text could recognise and aspire to the inclusion of this as an opportunity, perhaps within the body of Points 3 or Point 6 of Policy C4 – West Canvey. The council need to consider the challenges of overlapping timeframes will present between TE2100 aspirations for defence raising against proposed housing delivery. We would promote early engagement between the council, developers and Environment Agency as the plans for West Canvey are developed so that the potential issues related to the overlapping timescales can be addressed at the earliest stage. This should be reflected in the reasoned justification/supporting text.						convegance of Charfleets Dyke (that has historically suffered from land owner culverting). Consider the challendges of timeframes with the TE2100 and encourages early engagement with the EA - this should be included within the reasoned justification.		should integrate urban greening and incorpora te sustaina ble drainage into the approach to materials and landscap ing. The inclusion of flood resilient design and opportun ities to reduce the causes and impacts of flooding should also be consider ed where possible. " 8.39 added to end of paragrah. Early engagem ent with the

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											present between TE2100 aspirations for defence raising against proposed housing delivery. We would promote early engagement between the council, developers and Environment Agency as the plans for West Canvey are developed so that the potential issues related to the overlapping timescales can be addressed at the earliest stage. This should be reflected in the reasoned justification/supporting text.								environ ment agency is also recomen ded to consider the challeng es of overlapp ing timefram es will present between TE2100 aspiratio ns for defence raising against propose d housing delivery.
0 8 2 3- 0 0 7	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	C5	Yes		Yes		We support the Council's undertaking to carry out a feasibility study to look at options for improving access to, from and within Canvey Island. This would provide useful additional infrastructure to help facilitate evacuation in the event of forecast tidal flooding as well as providing	We support the Council's undertaking to carry out a feasibility study to look at options for improving access to, from and within Canvey Island. This would provide useful additional infrastructure to help facilitate evacuation in the event of forecast tidal flooding as well as providing improvements in day-to-day peak hour traffic congestion. We would strongly recommend that the Essex Resilience Forum are included in the scoping and undertaking of the feasibility study (in their multi-Agency Emergency Planning role) along	No	Not Ans wer ed		A	Support for policy C5 and suggestion for the inclusion of the reference to the Essex Resilience Forum in the supporting text at paragraph 8.50	Support noted, see proposed modifications	8.50 ECC as Highway and Transportation Authority will be required to be directly involved in the scoping and undertaki ng of any feasibility

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											improvements in day-to-day peak hour traffic congestion. We would strongly recommend that the Essex Resilience Forum are included in the scoping and undertaking of the feasibility study (in their multi-Agency Emergency Planning role) along with Essex County Council in their Highways and Transportation Authority role and perhaps this should be reflected in the text of paragraph 8.50.	with Essex County Council in their Highways and Transportation Authority role and perhaps this should be reflected in the text of paragraph 8.50.							study. The Essex Resilience Forum (in their multi-Agency Emergency Planning role) should also be included in the scoping and undertaking of the feasibility study.

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0 8 2 3- 0 0 0 8	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	C8	Yes		No	Consistent with national policy	We find part of Policy C8 (4.b.) unsound. The policy promotes a principle of increased residential development on these sites, but does not clearly state that increases in residential development on these sites cannot be in the form of Park Homes. These sites, Kings Park and Sandy Bay, lie within Flood Zone 3. Park homes intended for permanent residential use are classified by Annex 3: Flood risk vulnerability classification of the NPPF as “highly vulnerable”. Table 2 (para 079) of the Flood risk and coastal change PPG states that “Highly vulnerable” classes of development are incompatible with Flood Zones 3a and 3b and that those forms of development “should not be permitted”.		No	Not Ans wer ed		A	The EA raised concerns over the increased residential development on these sites, which are in Flood Zone 3, and which would not be permitted as compatible development under current Guidance as set out in table 2 of the Flood Risk and Coastal Change Planning Practice Guidance when considering the Flood Risk Vulnerability Classification of residential park homes (from Annex 2 of the NPPF).	With reference to paragraph 8.66 of the Plan, these sites have come forward under existing 50+ year old planning consents which permit the siting of caravans under the provisions of the Caravans Act 1960 and within the definition at the time this included Park Homes. The planning consents have no time constraints on development and no restrictions on whether the uses are for permanent or temporary seasonal accommodatio n. There is some scope under licencing of these sites to control the development of these sites. However, the local plan’s ability to influence the development of	“4. Any redevelo pment of these sites will be acceptab le where: 4.a. The risk to occupant s and property from flood risk and other hazards are minimise d. With residenti al develop ment having regard for flood resilient design can be found in Improvin g the Flood Performa nce of New Buildings and Building a Flood Resilient Future. All proposed develop

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											The reasoning as to why permanently occupied caravan, mobile home and park home sites were considered to have a high vulnerability to flooding was first given in Para 70 of PPG25 (2001) which stated:- “Caravan, camping and other temporary occupancy sites give rise to special problems in relation to flooding. They have often been located on coastal or riverside sites with a high risk of flooding. The instability of caravans places their occupants at special risk and it may be difficult to operate an effective flood warning system. Such development should be refused in the areas at highest risk, where overtopping or breach of defences would lead to rapid inundation, as should proposed changes of use to residential mobile							these sites is limited. The Council is keen to encourage that any dwellings on these sites are flood-resilient and has proposed changes to the policy to 4.a. and 4.b.	ment seeking planning permission should be accompanied by a flood emergency plan, demonstrating the steps that will be taken to manage flood risk. 4.b. The overall quantum of residential development is retained, or increased;

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											homes or permanent housing”. This principle was maintained and clarified when PPS25 replaced PPG25 in 2006 with the introduction of the Flood Zones and the Flood Risk Vulnerability Classification and the compatibility table of Flood Risk Vulnerability relative to Flood Zone (Annex D: Tables D1, D2 & D3 of PPS25). Paragraphs D19 to D21 of PPS25 Annex D gave the reasoning for classing permanent occupied/residential and temporary occupied/holiday caravan sites differently stating:- “D19. Land used for holiday or short-let caravans and camping, other temporary occupancy sites and permanently occupied caravan, mobile home and ‘park home’ sites that use similar structures give rise to special problems in								

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											relation to flooding. Caravan or park-home sites intended for permanent occupation are regarded as 'highly vulnerable'. The instability of such structures places their occupants at special risk and they are likely to be occupied during periods when flood risk is likely to be higher. D20. Sites intended for temporary occupation are classified as 'more vulnerable' because they are usually occupied at times of the year when flood events are less likely to occur, although they may be located for amenity and recreational reasons on coastal or riverside sites with a high residual risk of flooding. However, the attractiveness of waterside sites for holiday accommodation also has to be recognised, provided that proper warning								

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											and evacuation arrangements are put in place through appropriate planning conditions. D21. In either case, the Sequential Test and Exception Test should be used by decision-makers (where applicable, – remembering that ‘highly vulnerable’ development should not be permitted in Zones 3a and 3b and ‘more vulnerable’ development should not be permitted in Zone 3b). FRAs should pay particular attention to the management of residual risk, flood warning arrangements and evacuation plans should be considered (see Annex G)”. The NPPF and the Flood risk and coastal change NPPG maintain this position of “highly vulnerable” development classes being incompatible with									

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											Flood Zones 3a and 3b as can be seen in Table 2 of the PPG which is a retained version of Table D3 from PPS25. The NPPF is clear in paragraph 170 that Inappropriate development should be avoided in areas of highest risk. Table 2 of the PPG (which helps the LPA to apply the Sequential Test) states clearly that “highly vulnerable” classes of development should not be permitted in Flood Zones 3a or 3b. Both Sandy Bay and Kings Park lie within Flood Zone 3a. The Local Plan policy should better clarify the types of redevelopment that would be acceptable on this site, particularly if there is to be an increase in the overall quantum of residential development, for example a minimum of 2-storey flood resilient dwelling								

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											houses or blocks of flats (with no self-contained ground floor residential uses for flats) to replace conventional Park Homes. This would help to improve the flood resilience of housing on the site and provide better provisions for residents to be safe should flooding affect the sites. Currently part 4.c. of Policy C8 can be interpreted as any redevelopment will be acceptable if development (either Park Homes or conventional dwelling houses) retains or increases the number of residences. We feel that this part of the policy could be re-written to better reflect the spirit of the supporting text in the Reasoned Justification (para 8.69) and to offset any interpretation that the council is compliant to proposals that would seek to site								

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											a greater number of Park Homes on these sites and reflect the policies set out in the NPPF and PPG.								
0 8 2 3- 0 0 0 9	Organisation	Pat	Abbott	Environment Agency	Yes	B7	Yes		No	Justified	We note that site B7A (Richmond Avenue Car Park) is located in an area, shown by the current Flood Map for Planning, as falling within Flood Zone's 2 and 3. The Level 2 SFRA site summary (used as evidence base for Sequential Approach considerations) shows the site as predominantly within Flood Zone 1 – see below		No	Not Answered		A	The EA referred to the New National Flood Risk Assessment in their response to the Regulation 19 Public Consultation to the Castle Point Plan. It was noted that flood extents at two site allocation sites (Site B7A-Richmond	It is agreed that policy B7A and B8 has been updated to reflect the New National Flood Risk Assessment and be re-evaluated. The SFRA has been updated to take account of the New National Flood Risk Assessment and Sites B7A and B8 have been re-evaluated to ensure that the Sustainability	N

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											The Level 2 SFRA dated July 2025 has used outputs from the Flood Map for Planning prior to its update on 25th March 2025 which utilised the new National Flood Risk Assessment (NaFRA) data. We were not consulted by the LPA during the preparation of the Level 2 SFRA Site Assessments, and would have advised the LPA over the change in understanding over the extent of Flood Zones affecting this site. We would recommend that the Council reviews this site allocation by providing an updated SFRA Level 2 site evaluation to provide site-specific recommendations on the siting of residential and commercial development. This should take a Sequential Approach to the location of “more						Avenue car park and Site B8 Manor Trading Estate) had changed as a result of the NaFRA2 modelling.	Appraisal and Sequential Test are properly considered, and Level 2 SFRA site assessment has been updated for both sites.	

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											vulnerable” development to areas of the site that are at the lowest risk of flooding and making suitable text amendments to the site policy that would direct any housing development to be sited outside of the areas understood to be within Flood Zones 2 and 3 within the boundaries of the site. It should also be ensured that the site passes the flood risk sequential test taking into account the current flood risk affecting the site.								
0 8 2 3- 0 0 1 0	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	B8	Yes		No	Justified	We note that parts of site B8 (Manor Trading Estate) are located in an area, shown by the current Flood Map for Planning, as falling within Flood Zone’s 2 and 3 (below left). Prior to the 25th March 2025, the Flood Map for Planning showed the site lying wholly within Flood Zone 1 (see below right) FMfP (post-25th		No	Not Ans wer ed		A	The EA referred to the New National Flood Risk Assessment in their response to the Regulation 19 Public Consultation to the Castle Point Plan. It was noted that flood extents at two site	It is agreed that policy B7A and B8 has been updated to reflect the New National Flood Risk Assessment and be re-evaluated. The SFRA has been updated to take account of the New National Flood Risk Assessment and Sites B7A and B8 have	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											March 2025) FMfP (pre-25th March 2025) Unfortunately, the Level 1 SFRA has relied on the understanding of Flood Zones from the pre-March 2025 Flood Map for Planning which showed that the entirety of this site was previously understood to lie entirely in Flood Zone 1 and the LPA has not re- evaluated its SFRA or site evaluations since the updated Flood Map for Planning (March 2025). We would recommend that the Council reviews this site allocation by providing an updated SFRA Level 2 site evaluation to provide site- specific recommendations on the siting of residential and commercial development. This should take a Sequential Approach to the location of “more vulnerable”						allocation sites (Site B7A- Richmond Avenue car park and Site B8 Manor Trading Estate) had changed as a result of the NaFRA2 modelling.	been re- evaluated to ensure that the Sustainability Appraisal and Sequential Test are properly considered, and Level 2 SFRA site assessment has been updated for both sites.	

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											development to areas of the site that are at the lowest risk of flooding and making suitable text amendments to the site policy that would direct any housing development to be sited outside of the areas understood to be within Flood Zones 2 and 3 within the boundaries of the site.								
0 8 2 3- 0 0 1 1	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	HO U5	Yes		Yes		Caravans, mobile homes and park homes intended for permanent residential use are considered by Annex 3 of the NPPF to be “highly vulnerable” whereas sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plans are considered to be “more vulnerable”. Table 2 of the PPG for Flood risk and coastal change states that “Highly vulnerable” classes should not be permitted in Flood Zone 3a or	Caravans, mobile homes and park homes intended for permanent residential use are considered by Annex 3 of the NPPF to be “highly vulnerable” whereas sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plans are considered to be “more vulnerable”. Table 2 of the PPG for Flood risk and coastal change states that “Highly vulnerable” classes should not be permitted in Flood Zone 3a or 3b and that more vulnerable may be permitted if the Exception Test is passed and that there are adequate specific warning and evacuation plans in place. Policy Hou5 proposes that “consideration will be given as to whether a condition should be used to restrict the winter use of caravans.” Perhaps this should be reworded to read “consideration will be given as to whether a condition should be	No	Not Ans wer ed		A	Concern for caravans, mobile homes and park homes intended for premanent residential use within flood zone 3a. Policy Hou5 proposes that “consideratio n will be given as to whether a condition should be used to restrict the winter use of caravans.” Perhaps this should be reworded to read “consideratio n will be given	Policy wording change noted - see proposed modifications	2. Where applicati ons for new park homes are made, consider ation will be given as to whether a condition should be used to restrict the winter use of ~~caravans~~ Parkhomes . Winter use will be restricted where:

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											3b and that more vulnerable may be permitted if the Exception Test is passed and that there are adequate specific warning and evacuation plans in place. Policy Hou5 proposes that “consideration will be given as to whether a condition should be used to restrict the winter use of caravans.” Perhaps this should be reworded to read “consideration will be given as to whether a condition should be used to restrict the winter use of new Park Homes” The policy should be clear that new caravans or park homes intended for permanent residential use in FZ3 are contrary to the NPPF & PPG. We believe that the key issue here is the “residential” element as opposed to “holiday” use, and that this is partly why Park Homes are considered to	used to restrict the winter use of new Park Homes” The policy should be clear that new caravans or park homes intended for permanent residential use in FZ3 are contrary to the NPPF & PPG. We believe that the key issue here is the “residential” element as opposed to “holiday” use, and that this is partly why Park Homes are considered to be “Highly Vulnerable” and inappropriate to Flood Zone 3. This is partly because of their susceptibility to significant flood damage, rendering their occupants homeless (if the Park Home is their sole residence), as opposed to occupants not being rendered homeless if their seasonal caravan/Park Home is damaged by flooding. We believe that Policy Hou5 would be more compatible with the NPPF and PPG if the policy would contain wording to make clear that new Park Homes (1) cannot be the sole residence of the occupier/owner, (2) will be for holiday/leisure use through the authorised season, and; (3) occupancy will be seasonally restricted to times outside of the winter months. This would align the policy aims more towards the development appropriateness guidance in Table 2 of the Flood risk and coastal change PPG and the definitions of vulnerability classifications provided in Annex 3 of the NPPF which differentiate vulnerability for the use of these					as to whether a condition should be used to restrict the winter use of new Park Homes” The policy should be clear that new caravans or park homes intended for permanent residential use in FZ3 are contrary to the NPPF & PPG. We believe that Policy Hou5 would be more compatible with the NPPF and PPG if the policy would contain wording to make clear that new Park Homes (1) cannot be the sole residence of the occupier/owner, (2) will be for holiday/leisure use through the authorised season, and;		13.45 To this end, the Council will seek to limit the further provision of park homes to the existing caravan sites, and where possible and necessary will restrict new park homes providing residential accommodation to ensure these are not the sole residence where the occupants are likely to be at risk from flooding or the effects of cold

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											be “Highly Vulnerable” and inappropriate to Flood Zone 3. This is partly because of their susceptibility to significant flood damage, rendering their occupants homeless (if the Park Home is their sole residence), as opposed to occupants not being rendered homeless if their seasonal caravan/Park Home is damaged by flooding. We believe that Policy Hou5 would be more compatible with the NPPF and PPG if the policy would contain wording to make clear that new Park Homes (1) cannot be the sole residence of the occupier/owner, (2) will be for holiday/leisure use through the authorised season, and; (3) occupancy will be seasonally restricted to times outside of the winter months.	type of structures relative to “residential” or “holiday/short- let caravan usage.					(3) occupancy will be seasonally restricted to times outside of the winter months. This would align the policy aims more towards the development appropriaten ess guidance in Table 2 of the Flood risk and coastal change PPG and the definitions of vulnerability classification s provided in Annex 3 of the NPPF which differentiate vulnerability for the use of these type of structures relative to “residential” or “holiday/shor t-let caravan usage.			weather. It should be noted that the siting of most park homes on the existing sites will not require new planning consent as their provision is permitte d under the existing consents for the use of the site as a caravan park.

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											This would align the policy aims more towards the development appropriateness guidance in Table 2 of the Flood risk and coastal change PPG and the definitions of vulnerability classifications provided in Annex 3 of the NPPF which differentiate vulnerability for the use of these type of structures relative to “residential” or “holiday/short-let caravan usage.								
0 8 2 3- 0 0 1 2	Organisation	Pat	Abbott	Environment Agency	Yes	D6	Yes		Yes		Where there are proposals for residential annexes to single storey properties within flood risk areas, there are opportunities to provide areas of refuge above flood levels where none currently exist with the host building. Without opportunities to better manage the residual risks of flooding, there is a likelihood that the consequences of a flood to people and property will	Where there are proposals for residential annexes to single storey properties within flood risk areas, there are opportunities to provide areas of refuge above flood levels where none currently exist with the host building. Without opportunities to better manage the residual risks of flooding, there is a likelihood that the consequences of a flood to people and property will be worse Flood risk is a function of likelihood/chance and impact/consequence, and without useful mitigations. It is likely that flood risk will increase on sites through exposing more people to the hazards of flooding if extension or annex	Not Answered	Not Answered		A	EA requested within their response to the Regulation 19 consultation that additional wording should be added with regards extensions to single storey dwellings in high-risk flood areas, as residents in these types of dwellings are highly	Comments noted. Many extensions and annexes have permitted development rights and as such do not require planning permission and consequently the Local Plan has limited influence on these types of development. Please see modifications proposed.	1d. Flood Risk: The design of annex or extensions should include flood resistance and/or resilience measures to allow the development to be quickly brought back to use

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											be worse Flood risk is a function of likelihood/chance and impact/consequence, and without useful mitigations. It is likely that flood risk will increase on sites through exposing more people to the hazards of flooding if extension or annex developments are granted without addressing the increase in impact that a flood of a given likelihood could produce within the site. We would welcome an addition to the policy wording to identify that annexes and extensions to single storey properties located within areas of high flood risk (from rivers, the sea or from surface water) must provide a place of safety/refuge area for occupants that is above the assessed level of flooding from	developments are granted without addressing the increase in impact that a flood of a given likelihood could produce within the site. We would welcome an addition to the policy wording to identify that annexes and extensions to single storey properties located within areas of high flood risk (from rivers, the sea or from surface water) must provide a place of safety/refuge area for occupants that is above the assessed level of flooding from any source. For annex or extensions in areas at risk of flooding, flood resistance and resilience measures should be required as part of the design as specified in paragraph 181(b) of the NPPF so that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment.					vulnerable to flood risk. For such dwellings a place of safety/refuge above the assessed level of flooding from any source must be provided as part of the extension. The EA also requested that additional wording to be added for annexes or extensions in areas at risk of flooding, that flood resistance and resilience measures should be required as part of the design in order that the development could be quickly brought back into use without significant refurbishment.		without significant refurbishment following a flood event. For single storey dwelling, a place of safety/refuge above the assessed level of flooding from any source should be provided wherever possible.

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											any source. For annex or extensions in areas at risk of flooding, flood resistance and resilience measures should be required as part of the design as specified in paragraph 181(b) of the NPPF so that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment.								
0 8 2 3- 0 0 1 3	Organisation	Pat	Abbott	Environment Agency	Yes	ENV 3	Yes		Yes		Paragraph 18.29 - We feel this is a strong policy overall and particularly welcome the inclusion of the requirement for the delivery of 20% BNG on greenfield sites. We feel the policy and reasoned justification could be strengthened further through the inclusion of reference to measures that would contribute to Water Framework Directive objectives for developments		No	Not Answered		A	Strong support for this policy, the EA feels the reasoned justification could be strengthened by referring to Water Framework Directive objectives for developments adjacent to watercourses . This could include promoting opportunities for riverbank naturalisation , the removal of in-channel structures,	Noted, see modifications	18.29 The Environment Act 2021 introduced Biodiversity Net Gain. This mandates that most developments should deliver at least 10% biodiversity net gain, using a specific

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											adjacent to watercourses. This could include promoting opportunities for riverbank naturalisation, the removal of in-channel structures, de-culverting of piped watercourses, and riparian zone enhancements. Plans for development adjacent to or encompassing a watercourse should include a minimum 10 m buffer zone along both sides of the watercourse to create a corridor of land and water favourable to the enhancement of biodiversity.						de-culverting of piped watercourses , and riparian zone enhancements. Plans for development adjacent to or encompassing a watercourse should include a minimum 10 m buffer zone along both sides of the watercourse to create a corridor of land and water favourable to the enhancement of biodiversity.		metric developed by the Government. Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature

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																			Recovery network identified through the Local Nature Recovery Strategy for Essex. For developments adjacent to watercourses the Water Framework Objectives should be utilised.
0 8 2 3- 0 0 1 4	Organisation	Pat	Abbott	Environment Agency	Yes	INFRA1	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	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.	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	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

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											L. Our guidance is regularly revised, and therefore applicants should be advised to contact us to ensure that they are using the current version.						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.		people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, 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 proposal

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																			s relating to cemeteries and burial grounds, there should be regard to the guidance for Cemeteries and burials; Protecting groundwater from human burials and The Environment Agency's Approach to Groundwater Protection."

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 8 2 3- 0 0 1 5	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	Yes	SD1	Yes		Yes		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” 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…….” We strongly support the Council’s inclusion of a 19m land safeguarding buffer on the landward side of the existing tidal	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” 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…….” We strongly support the Council’s inclusion of a 19m land safeguarding buffer on the landward side of the existing tidal	No	Not Ans wer ed		A	Supports policy SD1 but suggests some ammendmen ts including: part 1.b. of Policy SD1 which incorrectly states “floor” and which should read “flood” 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…….”	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 develop ment, and favourabl

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											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 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-	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. 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 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					within the development 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. Paragraph 21.13 – this wording should be amended to read “The Council will work with the		e consider ation will be given to the conversi on of bungalo ws to houses, subject to those privacy, amenity and urban design consider ations set out in the Castle Point Design Code; 21.13 The TE2100 Plan, prepared by the Environm ent Agency and partners, sets out a policy for the maintena nce and improve ment of the sea defences

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											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. 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	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”.					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 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,		on Canvey Island in line with climate change projections. Improvements have already been delivered to the Island’s southern revetments and will be 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

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											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 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”.						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”.		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 a project level HRA. 21.15 Developers are encouraged to enter into discussions with the Environm ent Agency at

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																			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 Permittin g (England and Wales) (Amend ment) (No.2) Regulations in April 2016. Early discussio ns with

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																			the Environm ent Agency will avoid the potential for costly develop ment design and layout revisions or to avoid the risk of having a flood risk permit applicati on refused by the Environm ent Agency. Flood Risk Activity Permits are separate to the planning applicati on process and are required by the Environm ent Agency for certain

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																			activities within set distance s from tidal defences – further guidance is set out by the Environment Agency. 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.

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																			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 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

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																			construct ion of new defences as well as for vehicular access (4x4 or construct ion plant) to maintain and inspect and repair the defences over their lifetime). The Environm ent Agency has advised that a minimu m 19m buffer, as measure d from the landward edge of the current sea defence structure , should be left free from develop ment for

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																			this purpose.
0 8 2 3- 0 0 1 6	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	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	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	No	Not Ans wer ed		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	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

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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.	mapped areas of Functional Floodplain would be considered.					(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.		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 redevelopment of previously developed sites located within mapped areas of Functional Floodplain would be considered. In terms of fluvial

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																			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 the culverted sections of the drainage infrastruc

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																			ture. 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 topograp hy of the Borough could cause it to disperse over large areas.
0 8 2 3- 0 0 1 7	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	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	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.	No	Not Ans wer ed		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	Support noted, see proposed modifications	21.34 Essex County Council has prepared a SuDS Design Guide for Essex. This not only addresse s technical requirem ents for

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											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.						sustainable drainage systems on gov.uk.		SuDS, but also details how SuDS can be 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

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und ?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																			National standard s for sustaina ble drainage systems.
0 8 2 3- 0 0 1 8	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	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	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 infrastructure will support environmental objectives which will include the WFD requirement for no deterioration, therefore new developments will mitigate pollution to water under	No	Not Ans wer ed		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	Support noted, see proposed modifications	2. Develop ment proposal s ~~should~~ must be located, designed and construct ed in such a manner as to not be put at unaccept able risk from, be adversely affected by, or cause a significan t adverse effect upon the environm ent, the health of new and existing residents or surroundi ng residenti al amenity. This may

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											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 ‘major development applications	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. 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					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 ‘major		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 vibrations. 21.52 The Environm ent Agency’s Thames River Basin Manage ment Plan identifies that the lower Thames Estuary is of a moderat e quality in terms

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											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	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.' 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).					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		of its ecological status and is failing to achieve a good chemical status. The Water Environment (Water Framework Directive) Regulations 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,

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											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 pathway for pollutants. However, there is the							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. Paragraph 21.54 - reads, 'Currently, the LLFA does not support infiltration		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... 21.54 ECC as the LLFA will not support developments that propose to connect surface water to foul sewers as these systems can become overwhelmed, increasin

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											option for lined SuDS features to be installed, should site conditions allow.’ 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).						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.’ Paragraph 21.57 – The current		g 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 Environment Agency's Approac

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	wording in this paragraph reads ‘implementati on 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 contaminatio n 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 contaminatio n of land or local water		h to Groundw ater Protection,particu larly statements G1 and G9 to G13. Water quality Manage ment guidance can be found within Chapter 26 of the manual. When choosing potential SuDS features, consider ation around ground condition s and contamin ation is paramou nt. Infiltration SuDS must not be construc ted in contami nated ground as they

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																	courses' to include ground water (21.57).		have the potential 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. 21.57 Industrial develop

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																			ment may give rise to pollution to land and water, and/or result in disturban ce to habitat sites. Due to the limited scale of industrial develop ment, proposed studies have not focused on the impacts of this type of develop ment 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

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																			impact on the environment or residential amenity. In particular , the implementation of SuDS in non-residential development proposal s needs to be carefully considered, to ensure any pollutant s carried in surface water do not result in the contamination of land, ground water or local water courses nearby, or further afield, or result in adverse

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																			impacts to human health and residential amenity.
0 8 2 3- 0 0 1 9	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	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	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	Not Ans wer ed	Not Ans wer ed		A	Supports policy SD7 but suggests the following ammendments: but we suggest reference is added to published guidance: 'Developers should follow the risk	Support noted, see proposed modifications	21.62 Contami nated land could be created as a result of uses such as petrol stations, car washes, sites

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											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.' Paragraph 21.62 – For clarity we recommend an addition to the reasoned justification to paragraph 21.62 and/or point 21.57 that 'The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.'	framework provided in 'Land Contamination: Risk Management', when dealing with land affected by contamination.' Paragraph 21.62 – For clarity we recommend an addition to the reasoned justification to paragraph 21.62 and/or point 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.' Paragraph 21.62 – For clarity we recommend an addition to the reasoned justification to paragraph 21.62 and/or point 21.57 that 'The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.'		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. D eveloper s should follow the risk management framework provided

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																			in 'Land Contami nation: Risk Manage ment', when dealing with land affected by contami nation.T he responsi bility for securing safe develop ment on land affected by contami nation rests with the develope r and/or landown er.

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 8 2 3- 0 0 2 0	Organisatio n	Pat	Abb ott	Envir onme nt Agenc y	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.	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 Local Plans both show that this level is technically achievable through a fittings based approach, reduced demand, and, where appropriate, water reuse	Not Ans wer ed	Not Ans wer ed		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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											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	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 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							

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											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	from Anglian Water, the foul water undertaker.							

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											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.								

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0 0 7 0- 0 0 0 1	Individual	Fran ces	Ada ms		Not Stated	SP3	No	To whom it may concern, I would like it to be known that as a resident of Canvey for [REDACTED] I strongly object to the proposed Regulation 19 plan involving further development on the Island. I have read Dame Rebecca Harris' email to you regarding the said plan. I agree wholeheartedly with everything she has said in respons	No	Justified, consistent with national policy	e. I consider the plan to be unsound. It fails the tests of soundness for justified and consistence with national policy. It does not meet the housing target for CastlePoint, and the site ignores Greenbelt/Greybelt against NPPF guidelines. The plan needs amending, the current plan allows for the overdevelopment of CastlePoint especially Canvey, there is a lack of infrastructure, sewerage and drainage, along with flooding implications.	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the overdevelopment of our urban sites. in fact , considering the NW Thundersley site will give a housing target of 11000.	No		No		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Gr eybelt against new NPPF guidelines. There are far too many properties on Canvey Island already. There is not enough access to leave the Island in an emergency. The plan allows for over development of Castlepoint especially Canvey where	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ' A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in	N

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																	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.	Appendix A. South Essex Implementation Plan	
0 1 3 6- 0 0 0 1	Individual	Lorra inne	Ada ms		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	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. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances,

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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.						"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.	landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).
0 1 3	Individual	Lorrai ne	Ada ms		Yes	C4	No	Canvey West homes puts residents in the East at risk with	No	Not Stated			Not Stat ed		No	A	The number of Canvey West homes	Needs of emergency services	N

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6- 0 0 0 2								emergency evacuation procedures.									puts residents in the East at risk with emergency evacuation procedures	considered in the supporting Infrastructure Delivery Plan (IDP).	
0 7 9 4- 0 0 0 1	Individual	Daniel	Adams		Yes	SP3	Yes		Yes		- The plan is sound but: - there's insufficient additional housing planned to meet national policy. - there are no plans to upgrade highways network to accommodate planned housing. - The North West Thundersley area should therefore be considered for large scale housing so as to help meet national policy levels. This area is the least useable green belt of any in the borough - so could be re-classified for housing. Access to the highways network could be made around the Fairglen Interchange, thereby reducing any extra traffic flow across more urban, already congested parts of the borough.	- The North West Thundersley area should be considered for large scale housing so as to help meet national policy levels. This area is the least useable green belt of any in the borough - so could be re-classified for housing. Access to the highways network could be made around the Fairglen Interchange, thereby reducing any extra traffic flow across more urban, already congested parts of the borough.	No	Not Answered	Not Answered	A	Not meeting standard method Transport North West Thundersley	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole,	N

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																		to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport	

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																		Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons	

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																		set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	
0 7 9 4- 0 0 0 2	Individual	Daniel	Adams		Yes	T3	Yes		Yes		Sustainable travel needs to be enhanced further than the plan aims to do. The plan should try to reduce use of private motor vehicles in favour of public transport and cycling/walking. To this end, significant improvements should be made to cycle routes, which are currently very limited. Whilst it's acknowledged that the topography of		Not Answered	Not Answered		A	Sustainable Transport	Chapter 20 of the Local plan is committed to promoting and encouraging Sustainable Transport.	N

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											Benfleet acts as a barrier to cycling, well surfaced off-road routes could be added on Essex Way, whilst joint cycle-footpaths should be added elsewhere where the roads are too narrow to accommodate safe cycling. A13 is wide enough to have a cycle/bus lane along more length than is currently the case.								
0 7 9 4- 0 0 0 3	Individual	Daniel	Adamson		Yes	T3	Yes		Yes		Sustainable travel needs to be enhanced further than the plan aims to do. The plan should try to reduce use of private motor vehicles in favour of public transport and cycling/walking. To this end, significant improvements should be made to cycle routes, which are currently very limited. Where A13 is not wide enough to accommodate safe cycling, the footpath should become joint cycle-pedestrian path.		Not Answered	Not Answered		A	Cycle Routes	Policy T3 seeks to secure active travel improvements	N

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											Whilst on-road cycle infrastructure is welcomed on the roads mentioned (including Church Rd), for this to be safe, on-road parking will need to be removed. This will also ease congestion. Speed humps on Scrub Lane are very uncomfortable for cyclists, so better types could be used.								
0 7 9 4- 0 0 0 4	Individual	Daniel	Adamson		Yes	HA D4	Yes		Yes		Whilst housing in this location seems a good use of no longer used land, the capacity and density calculation results in too many houses for such a small area, ie 114 homes is too many - 60 dwellings would be more appropriate.		Not Ans wer ed	Not Ans wer ed		A	Density proposed on Had4	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	N
0 7 9 4- 0 0 0 5	Individual	Daniel	Adamson		Yes	T3	Yes		Yes		Sustainable travel needs to be made easier and safer. Measures should be taken to reduce use of private motor vehicle, especially for short distance trips. Much improved cycle routes are required, as these are terrible at present and it's		Not Ans wer ed	Not Ans wer ed		A	Better cycle routes in Thundersley	Policy T3 seeks to secure active travel improvements	N

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											very dangerous to try to cycle across Thundersley. Cycle routes need to be connected with Hadleigh, Rayleigh Weir, Sth Benfleet/Canvey via an off road path in Essex Way and the rest of Benfleet via permitted off road cycling on Bread and Cheese Hill (upwards only). Benfleet Road is too narrow and busy for safe on-road cycling, so the footpath should become joint cycle-pedestrian. The same applies to most parts of Church Rd/Hart Rd/Kenneth Rd. A surface/path that can be cycled on should be added to the whole length of The Chase. At present, whilst a quiet east-west route, the unmade surface is very difficult and dangerous to cycle on. The path between Thundersley Common and Kingsley Lane is currently not permitted for								

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											cycling, yet this would be the safest route to cycle from A127 (Rayleigh Weir) into Thundersley village and there is enough space for a cycle path alongside existing path for (dog) walking. Until such measures are taken to improve cycle safety and efficiency, it will be difficult to incentivise people to switch from cars to cycling.								
0 7 9 4- 0 0 0 6	Individual	Dan iel	Ada mso n		Yes	DH 1	Yes		Yes		Plan mentions “Introduce FURTHER cycle routes along New Road/Daws Heath Road..” - there are none at present! To allow for safe cycling between Daws Heath and Thundersley/Hadleigh, Daws Heath Road should have narrow on-road cycle lanes where no pavement and joint cycle-pedestrian path where there is pavement.		Not Ans wer ed	Not Ans wer ed		A	Better cycle routes in Daws Heath	Policy T3 seeks to secure active travel improvements and Policy DH1 promotes connectivity within Daws Heath	N
0 7 9 4- 0	Individual	Dan iel	Ada mso n		Yes	DH 2	Yes		Yes		No further development should be permitted in the Daws Heath area.		Not Ans wer ed	Not Ans wer ed		A	No development in Daws Heath	Policy DH2 seeks to protect undeveloped land between Daws Heath and	N

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0 0 7											Any further development will risk the village losing its identity and it's vital that no more green belt land is lost. Also Daws Heath Road will not be able to cope with further development, especially at either end (Woodmans and Scrub Lane/New Road). Housing in the lower grade green belt in north Thundersley is a more viable alternative for development as the green belt there is less used, has less wildlife and is close to the main highway network of A130/A127 at Fairglen interchange.							neighbouring settlements to prevent the coalscence of settlements.	

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0 7 9 4- 0 0 0 8	Individual	Dan iel	Ada mson		Yes	GB1	Yes		Yes		It's vital we protect the green belt across the borough with any housing development only in very select locations. Housing in the lower grade green belt in north Thundersley is the most viable area for development as the green belt there is less used, has less wildlife and is close to the main highway network of A130/A127 at Fairglen interchange. This should be incorporated into the plan.		Not Ans wer ed	Not Ans wer ed		A	Protect the Green Belt Release North West Thundersley	Green 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	N

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																		highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. North West Thundersley	

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																		North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	
0 7 9 4- 0 0 0 9	Individual	Daniel	Adams		Yes	T3	Yes		Yes		Whilst the sustainable and active transport policy is welcomed and crucial to avoid even worse traffic congestion, it requires vast improvements to the cycle network		Not Answered	Not Answered		A	Policy T3 is welcomed but needs investment	Support noted.	N

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											across the borough - examples of which have been included in my comments in the sections on individual towns in the borough. Otherwise there will be no incentive to switch from car to cycle.								
1 4 3 2- 0 0 0 1	Individual	Dan iel	Ada mso n		Yes	Had 4	Yes		No	Effective	114 homes on the land off Scrub Lane is far too many and would lead to gridlock on Scrub Lane and neighbouring roads. 25 homes would be a more suitable number for this space	Reduce the number of houses to be built on this land to something like 25.	No				114 homes on the land off Scrub Lane is far too many and would lead to gridlock on Scrub Lane and neighbouring roads. 25 homes would be a more suitable number for this space	Noted	N
0 8 4 7- 0 0 0 1	Individual	Shar on	Ains ley		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 1 9- 0 0 0 1	Individual	Judy	Aitk en		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 2 7 6- 0 0 0 1	Individual	Luk e	Alde n		Yes	B8	No	I am a local business on the Manor Trading Estate and have had a presence on the estate since 2006. 1st I record that I have had the opportunity to read and fully understand my neighbour “G&K Groundworks Ltd” Unsound submission. For clarity I attach a copy of G&Ks submission to this e-mail.	No	Not Stated	I record here that Manor Training Centre UK Ltd agree with G&K Groundworks Ltd.’s that the regulation 19 draft as presented is Unsound. For the record and as relayed in G&K Groundworks Ltd submission • CPBC have never engaged with me / my business about our future on this estate. • Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough • I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. I am certainly more confused now! Where am I going to be re-homed?	Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business.	No		Yes, attached is G&K Groundworks ltd's response to the consultation		The regulation 19 draft as presented is Unsound. CPBC have never engaged with the business community on this estate. Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. Some Background G&K are the	Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	N

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											This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it's OK to treat us the MTE business community with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy.						title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre's which is except for connect packaging the largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors nor CPBC co-		

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																	opted Deyton Bell. Fact this property has warehousing & storage buildings along with separate offices and external yards • 10 units have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to the local economy.		

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																	It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Questions over consistency with CPBC Regeneration policies		

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0 5 8 7 - 0 0 0 1	Individual	Vera	Allen		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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																		above. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoin t.gov.uk/emerge ncyplanning/ Third Road 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.	

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

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0587-0002	Individual	Vera	Allen		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 8 7 - 0 0 0 3	Individual	Vera	Allen		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
1 3 5 2- 0 0 0 1	Individual	Mrs VM	Allen			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											the overall site environment for the local residents.								
1 3 5 2- 0 0 0 2	Individual	Mrs V M	Alle n			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	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	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 Assessm

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											proposed 3316 urban homes for Canvey is not resident led.							5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further	ent (SFRA).

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																		information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt	

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																		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 highway network in and around Castle Point, Evidence	

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																		of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk	

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																		Assessment (SFRA), 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.	
1 3 5 2- 0 0 0 3	Individual	Mrs VM	Alle n			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 3 1 9- 0 0 0 1	Individual	Jane t	Alm ond			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.								
1 3 1 9- 0 0 0 2	Individual	Jane t	Alm ond			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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											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.							important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land	and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley	

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																		was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing	

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																		flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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																		Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 1 9- 0 0 0 3	Individual	Jane t	Alm ond			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0 3 7 3 - 0 0 0 1	Individual	Rich ard	Amb rose		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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0 4 1 4 - 0 0 0 1	Individual	Jess	And erso n		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 1 5 - 0	Individual	Byro n	And erso n		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 0 1																			
1 4 1 9- 0 0 0 1	Individual	Julie	And erso n		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N
1 0 2 9- 0 0 0 1	Individual	JEAN	AND OW		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0 3 0- 0 0 0 1	Individual	Fran k	And ow		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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																		safeguarded by policy HAD3	
0 4 7 8 - 0 0 0 1	Individual	Shei la	Andr ews		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No		All		Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So un d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 2 8 8- 0 0 0 1	Individual	Noah	Anwo	Deby et Tradin gs Ltd	Yes	B8	No	I am a local business on the Manor Trading Estate and have had a presence on the estate since 2006. 1st I record that I have had the opportunity to read and fully understand my neighbour “G&K Groundworks Ltd” Unsound submission. For clarity I attach a copy of G&Ks submission to this e-mail.	No	Not Stated	I record here that Manor Training Centre UK Ltd agree with G&K Groundworks Ltd.’s that the regulation 19 draft as presented is Unsound. For the record and as relayed in G&K Groundworks Ltd submission • CPBC have never engaged with me / my business about our future on this estate. • Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough • I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. I am certainly more confused now! Where am I going to be re-homed?	Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business.	No		Yes, attached is G&K Groundworks ltd's response to the consultation		The regulation 19 draft as presented is Unsound. CPBC have never engaged with the business community on Manor Trading Estate. Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. Some Background	Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	N

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											This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it’s OK to treat us the MTE business community with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy.					G&K are the title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre’s which is except for connect packaging the largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors			

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																	nor CPBC co-opted Deyton Bell. Fact this property has warehousing & storage buildings along with separate offices and external yards • 10 units have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to the local		

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																	economy. • It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Questions over consistency with CPBC Regeneration policies		

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0 8 6 4- 0 0 0 1	Individual	Carr ie	App s		Yes	HA D2	Yes	X	No	Positively prepared, Effective, Justified, Consistent with national policy	I object to the proposed allocation of the HAD2 site (Hadleigh Salvation Army Land and Green Belt) for housing development in the Castle Point Local Plan (Regulation 19 Draft, July 2025). My objection is based on the following grounds, with references to the relevant sections of the Plan: 1. Inappropriate Development in the Green Belt The Plan's own Green Belt policy (Section 17, pp. 126–130, Policy GB1, paragraphs 17.1–17.12) makes it clear that development in the Green Belt is inappropriate unless “very special circumstances” exist. No such circumstances have been demonstrated for HAD2 and the Green Belt . Allocating this site would undermine the fundamental purpose of the	With reference to the above sections and policies of the Castle Point Local Plan Regulation 19 Draft (July 2025), I respectfully request that the allocation of HAD2 be removed from the Plan. The Council should instead focus on delivering new homes through urban and brownfield regeneration, in line with its own stated strategy and the wishes of the local community. I'd like to suggest The Blinking Owl Site (GB8) as this would be less impacting to the landscape and heritage and has better access compared to Hadleigh.	No	Not Ans wer ed	Not Ans were d		Objecting to built development on site HAD2	Policy HAD2 does not propose housing to be built on this site.	N

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											Green Belt, which is to prevent urban sprawl and protect the openness of the landscape. 2. Harm to Openness, Landscape, and Heritage HAD2 sits adjacent to Hadleigh Castle and Hadleigh Country Park—both of which are highly valued for their landscape, biodiversity, and heritage. Section 10 (Hadleigh, pp. 66–73, especially paragraphs 10.12–10.19) and Section 18 (Protecting our Biodiversity and Landscape, pp. 131–141, Policy BL1) of the Plan highlight the importance of these assets. Development here would cause irreversible harm to the openness of the Green Belt and the setting of these historic and natural features. 3. Infrastructure and Congestion Section 19 (Providing the Infrastructure Required to Support Growth,								

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											pp. 142–155, Policy INF1, paragraphs 19.1–19.14) acknowledges that Hadleigh already suffers from congestion and infrastructure constraints. Adding a large housing development at HAD2 would only make these problems worse, putting further strain on local roads, schools, and health services. 4. Failure to Prioritise Brownfield and Urban Sites The Plan’s spatial strategy (Section 6, pp. 19–30, Policy SP2, paragraphs 6.10–6.18) and housing policies (Section 13, pp. 85–93, paragraphs 13.1–13.8) both commit to an “urban-first, brownfield-led” approach. Allocating HAD2 directly contradicts this strategy, as there are still brownfield and urban sites available that would cause less								

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											harm and better align with the Plan's objectives. 5. Community Opposition and Policy Conflict Section 5 (Vision & Objectives, pp. 17–18) and the Plan's consultation summary reflect overwhelming community opposition to the loss of Green Belt land at HAD2. Proceeding with this allocation would undermine public trust and conflict with both local and national policy priorities.								
0 2 2 5- 0 0 0 1	Individual	War ren	Arm stro ng		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has not conducted upto date flood assessments for the areas of concern, and ignores very serious concerns around infrastructure and safety given Canvey's flood risk. I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for	> PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option.	Not Stat ed		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	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-

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											Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. The proposed site additionally does not provide the 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						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.	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.	blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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											and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.								
0 2 2 5- 0 0 0 2	Individual	War ren	Arm stro ng		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 6 8 7- 0 0 0 1	Individual	E	ARS COT T	No	Yes	For ew ord	No	No as usual with these things there is a lot of blurb and no substance just a ticking box exercise by the council for the government with no consiederation for the people or surrounding areas of Canvey Island	No	Positively prepared, Effective, Justified, Consistent with national policy	Again tick box exercise	Abandon this ridiculous notion that in access of 3000 additional homes can be built on Canvey Island with out major impact to current population, schools, doctors, transport, roads, flooding, wildlife.	No	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is not sound or legally compliant	Comments Noted.	N
0 7 0 6- 0 0 0 1	Individual	Pet er	Arte r		Yes	SP3	No	Whilst I agree with and support the local plan vision for the Hadleigh Farm area, being a local resident there for over 40 years, I am concerned, having read the comments of our MP, Dame Rebecca Harris, that the plan does not at present meet national policy and is not justified in that it does not meet policy targets and has not even included any greenbelt or grey belt sites including particularly the North West Thundersley site. for further detail see the comments of Dame Harris, with which I fully agree.	No	Justified, Consistent with national policy	see my previous comments above.	Inclusion of North West Thundersley site.	No	Not Ans wer ed	Not Ans were d	A	North West Thundersley	North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and	N

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																		also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	
0 0 7 1- 0 0 0 1	Individual	Daw n	Artle y		Not Stated	SP3	No	I consider the Castlepoint Plan regulation 19 Draft to be unsound	No	Justified, consistent with national policy	It fails the tests of soundness for justified and consistent with national policy.It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines.	The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	No		No	A	I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan	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	N

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																	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.	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	
0 1 6 6- 0 0 0 1	Individual	Pete r	Artle y		Not Stated	SP3	Not Stat ed		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	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	Not Stat ed		No		It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site	Green Belt/Grey belt covered under policy GB2. North west Thundersley was not preferred for reasons set out	N

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											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.						ignores Greenbelt/Greybelt against new 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.	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). Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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0 6 5 9- 0 0 0 1	Individual	Barr y	Asht on		Yes	HA D2	Yes		Yes	Justified	Not fully clear enough, to be fully sound. Needs a clear stance on the green belt and that this can never be built upon. (The Salvation Army) As owners of green belt land it is their custodian obligation to protect it. As a council it is also your obligation to protect it, therefore there should be a clear statement of intent that this land will never be used for property or profit.	Not fully clear enough, to be fully sound. Needs a clear stance on the green belt and that this can never be built upon. (The Salvation Army) As owners of green belt land it is their custodian obligation to protect it. As a council it is also your obligation to protect it, therefore there should be a clear statement of intent that this land will never be used for property or profit. Green belt should always remain green for our future generations	Yes	Not Ans wer ed	Not Ans were d		Needs to be clearer that Green Belt is protected and will never be built on.	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 highway	N

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																		network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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0 8 5 3- 0 0 0 1	Individual	Jon athan	Astl ey		Yes	HA D4	No	I live in this area and will be adversely impacted by this proposed development and I haven't been consulted	No	Positively prepared	The area is overcrowded and there are insufficient local services such as doctors / dentists, additionally the road infrastructure is often blocked with traffic. I can see no benefit to anyone in the community by building further housing on this site.	It isn't a valid proposal therefore I believe for the benefit of the community development should not occur here.	No	Not Ans wer ed	Not Ans were d		Objects to HAD4 due to traffic on scrub lane and infrastructure	Traffic Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
0 3 2 3- 0 0 0 1	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		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)				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	Supports noted Mods proposed in relation to Green Infrastructure Map (page 21), Policy C3, and supportrring paragraphs 8.30 and 8.32. All policies in the Plan apply,	Page 21 – Green Infrastruc ture Map: Map key for this image requires updating to highlight all the green infrastruc

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												Replace the stepped trajectory with an annual, site-by-site profile including non-implementation discounts. (c) Remove holiday replacement units from the deliverable tally unless robust evidence is provided. (d) Publish a clear Affordable Housing delivery plan with monitoring triggers. (e) Audit Council-owned residential estates for early densification and include them in the trajectory. (f) Commission and publish a Garden Land Capacity Study to inform policy.					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.	so cross-refernces are generally not considered necessary.	ture designations shown on the map, some of which appear to be missing from the key
0323-0002	Organisation	Michael	Atkins	Port of London Authority		C2											<u>Policy C2 - Canvey Seafront Entertainment Area:</u> Support the Councils intention to prepare a Master Plan for the Canvey Seafront Entertainment area. The PLA has previously been consulted on initial discussions and would wish to continue to be involved in	Noted	N

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																	the project as it progresses.		
0 3 2 3- 0 0 0 3	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		C3											<u>Policy C3 - Canvey Port Facilities:</u> In principle the PLA support the continued promotion of the boroughs port facilities at Canvey and it is welcomed that supporting paragraph 8.27 states recognises that The Calor Gas and Oikos terminals are nationally significant and have a role to play in ensuring the security of energy supplies in the UK. In addition it is considered that there should be a link added to policy SD6 (Pollution Control) particularly with regard to the	Mods proposed	8.27 There are two port facilities located adjacent to each other at south Canvey. These port facilities include the Calor Gas terminal located to the west of Thames Road for the importation and storage of liquefied petroleum gas and the Oikos terminal to the east of Haven Road, which receives and stores oil and a

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																	importance for SD6(3) that development proposals adjacent to, or in the vicinity of, existing businesses or community facilities will need to demonstrate that the ongoing use of the existing businesses or community facilities would not be prejudiced by the proposed development, in line with the Agent of Change included in paragraph 200 of the National Planning Policy Framework (NPPF) (2025). Note and support the reference (Paragraph 8.32) to the Southeast Inshore Marine Plan and the potential		range of hydrocarbon products. Both terminals have close good deep-water accessible jetties with good access to shipping lanes that are used to receive fuel imports by ship. These fuels are exported from the terminals by pipelines and by road tanker. The Calor Gas and Oikos terminals are nationally significant, well situated close to

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																	need for separate consents from the Marine Management Organisation (MMO). Alongside this there should be a reference to the Port of London Authority's River Works Licencing process, which also forms a requirement as part of any works in, on or over the Tidal Thames. Within paragraph 8.30 – the reference to the English Coast Path should be updated to state 'King Charles III England Coast Path'.		the mouth of the Thames estuary and gateway to the Port of London, and have a role to play in ensuring the security of energy supplies in the UK. 8.30 The port facilities occupy a substantial frontage of the waterfront at South Canvey. This limits access to a narrow strip of the waterfront in this location, creating an enclosing effect for users. This

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

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																			Consider ation needs to be given to how any such changes impact on the marine environm ent or its use, including any conflicts arising with other users. Separate consents from the Marine Manage ment Organisa tion will be required for certain types of activity, and the Port of London Authority 's River Works Licencin g process also forms a requirem

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																			ent as part of any works in, on or over the Tidal Thames.
0 3 2 3- 0 0 0 4	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		C5										A	<u>Policy C5 - Improved Access to and around Canvey Island:</u> The PLA should, where appropriate be consulted on any future proposals to deliver a third access route to/from Canvey as part of a forthcoming feasibility study, informing the first review of the Castle Point Plan to identify options for improving access to, from and within Canvey Island. As part of this	Support noted.	N

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																	welcome that paragraph 8.15 of the reasoned justification recognises the proximity of the Benfleet and Southend Marshes SPA and Ramsar site and the Thames Estuary and Marshes SPA and Ramsar site.		
0 3 2 3- 0 0 0 5	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		C6											Policy C6 - The South Canvey Green Lung: In principle support the intention of the policy, with regard to the potential for renewable energy provision within the South Canvey Green Lung where it can be demonstrated that a high level of biodiversity net gain can be secured and there will be no adverse	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So un d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	impact on the integrity of nearby Habitats Sites.		
0 3 2 3- 0 0 0 6	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		C9											Policy C9 – Land at the Point, Canvey Island: Support the reference on the need to ensure access to smallgains marina is maintained for water-based recreation as part of any future development at this location.	Support noted.	N
0 3 2 3- 0 0 0 7	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		D4											Policy D4 – Landscaping: As part of the reasoned justification (16.48) with regard to the public realm, it is considered that there must be appropriate wording included on the vital need for future waterside developments to provide appropriate	Mods proposed	New para after 16.48 Waterside developments should provide appropriate riparian life-saving and safety equipment) as recommended by the Port

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																	riparian life saving equipment (such as grab chains, access ladders and life buoys) alongside riverside areas as recommended by the PLA's 'A safer Riverside Guidance' for development on and alongside the Tidal Thames (A Safer Riverside Port of London Authority). The PLA also considers that there is need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along the riverside. This is supported		of London Authority 'A Safer Riverside Guidance' and the 'Drowning Prevention Strategy' (2019) produced by the Tidal Thames Water Safety Forum.

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																	by the Drowning Prevention Strategy (2019) (https://www.pla.co.uk/Safety/Water-Safety/Water-Safety) produced by the Tidal Thames Water Safety Forum, which comprises a number of agencies including the PLA, RNLI and emergency services.		
0 3 2 3- 0 0 0 8	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		ENV 2										A	<u>Policy ENV2 – Coastal & Riverside Strategy:</u> To confirm the PLA must also be included as part of the councils proposal to prepare a Riverside Strategy for the borough. Related to this consideration should also be given as to whether the policy should include reference to	Mods proposed	Policy ENV2 – Coastal & Riverside Strategy 1. Working with the Environment Agency, ECC Lead Local Flood Authority, neighbouring authorities, the community, the Port of

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																	the Estuary Edges guidance which presents a 'how to' guide for developers on ecological design for softening these 'edges' to encourage wildlife into urban estuaries. (About - Estuary Edges - The Thames Estuary Partnership).		London Authority and other relevant stakeholders the Council will prepare a Riverside Strategy.
0323-0009	Organisation	Michael	Atkins	Port of London Authority		T6										A	Promoting Sustainable Transport: Within this section it is considered that there must be a reference on the need to maximise the use of the Tidal Thames for both passengers and freight, including for the transportation of construction materials to, and waste from a development	Mods proposed Support for T6 noted.	<u>Policy T1</u> = <u>Transport Strategy - New</u> <u>parapraph</u> 9. Supporti ng the use of the Tidal Thames for both passeng ers and freight <u>New</u> <u>supportin</u> <u>g text</u> <u>paragrap</u> <u>h</u>

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																	either directly to/from a site or through the supply chain. This would align with the Local Plan objectives to Secure the delivery of net zero development and secure the transport infrastructure needed to support growth and is supported by the PLAs Thames Vision, which includes the aims to see more goods and materials routinely moved on the river, and to see a Thames that is more accessible to all. (Thames Vision 2050 Port of London Authority) Policy T6 - Safe Access: Support in principle the aim to ensure that development proposals		20.31 Supporting the use of the Tidal Thames for both passengers and freight aligns with wider objectives to secure the transport infrastructure needed to support growth, to secure the delivery of net zero development and for a River Thames that is more accessible to be enjoyed by all.

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																	offer safe access either directly or via appropriate mitigation, including safe access to the site for cyclists and footway provision for pedestrians. This is particularly important for coastal paths, and the access' to/from them, to ensure these are well lit and welcoming for all users.		
0 3 2 3- 0 0 1 0	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		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	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 considred in unison.	N

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																	of the nationally significant Canvey port facilities.		
0 3 2 3- 0 0 1 1	Organisatio n	Mic hael	Atki ns	Port of Londo n Autho rity		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	Policy SD6: Support and points noted	N

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																	can be satisfactorily mitigated through the development proposals. This is particularly relevant with regard to any potential future development located in proximity to Canvey's port facilities, and the need for these to be able to continue to operate over 24 hours a day as nationally importance facilities. To strengthen this policy further specific reference should be given to the 'Agent of Change' principle that part 3 of the policy sets out.		

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0 0 8 1- 0 0 0 1	Individual	Kare n	Atte nbur y		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, The NPPF guidelines state development	North-West Thundersley and Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to 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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											infrastructure, the proposed 3316 urban homes for Canvey is not resident led.						should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led. 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.		
0 0 8 1- 0	Individual	Karen	Attenbury		Yes	C4	No		No	Justified, Consistent with National policy	The number of Canvey West homes puts residents in the East at risk with		No		No	A	The number of Canvey West homes puts residents in	Needs of emergency services considered in the supporting	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 2											emergency evacuation procedures.						the East at risk with emergency evacuation procedures.	Infrastructure Delivery Plan (IDP).	
0 9 0 6- 0 0 0 1	Individual	davi d	atte rsle y	none	Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 1 6 - 0 0 0 1	Individual	Sara h	Attri ll		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 1 7 - 0 0 0 1	Individual	Jam es	Attri ll		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 1 7 6- 0 0 0 1	Individual	Rus sell	Aubi n			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	<u>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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 7 6- 0 0 0 2	Individual	Rus sell	Aubi n			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 1 7 6- 0 0 0 3	Individual	Rus sell	Aubi n			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 1 7 7- 0 0 0 1	Individual	Car ole	Aubi n			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						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	this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 7 7-	Individual	Car ole	Aubi n			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 0 2								Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1 1 7 7- 0 0 0 3	Individual	Car ole	Aubi n			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 0 8 2- 0 0 0 1	Individual	Nat ash a	Ayle n		Yes	HA D4	Yes		No	Positively prepared	The infrastructure surrounding Scrub lane in particular the junction with Rectory Road and New Road cannot accommodate additional traffic this development would cause. With two schools in close proximity and already in adequate parking for safe drop off and collection of children this will also cause safety issues. The building of this development also does not fit in with the current build of Scrub Lane. The build removes		No	Not Ans wer ed	Not Ans were d		Objects to HAD4 because: Density Traffic Infrastructure Proposal contradicts objective 19 due to loss of a playing field	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal	N

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											green space for young children learning. The outdoor space should be utilised for exercise which promotes a healthy lifestyle. It also allows team sports to take place whether these are school sports or outside organisations. We cannot take this away from our future generation by building homes which are simply not practical to the infrastructure.							will also have to comply with T5 to ensure sufficient highway impact mitigation. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Policy HAD4 requires suitable mitigation for the loss of the playing field facility in accordance with objective 19	
0 0 9 2- 0 0 0 1	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	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.	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away	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	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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											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						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.	options have been considered through the 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
											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.								
0092-0002	Individual	Dave	Bailey		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
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	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	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

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											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.						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 /	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	landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (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. 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
																	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 residential. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered in the supporting Infrastructure Delivery Plan (IDP).	
0321-0	Individual	Amy	Bailey			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not stated							The number of Canvey West homes puts residents in	Needs of emergency services considered in the supporting	N

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0 0 2																	the East at risk with emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0 4 5 3 - 0 0 0 1	Individual	Susan	Baillie		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 1 0- 0 0 0 1	Individual	Robert	Baillie	N/A	Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 5 4 5 - 0 0 0 1	Individual	Jean	Bak er		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 4 5 - 0 0 0 3	Individual	Jean	Bak er		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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0 8 3 8- 0 0 0 1	Individual	TER RY	BAK ER		Yes	Wh ole Pla n	Yes		Yes	Positively prepared			No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant	Support noted.	N

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1 2 2 8- 0 0 0 1	Individual	Ray mon d	Bak er			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 2 8- 0 0 0 2	Individual	Ray mond	Bak er			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 2 2 8- 0 0 0 3	Individual	Ray mon d	Bak er			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 3 2 2- 0 0 0 1	Individual	Reg	Bak er			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 3 2 2- 0 0 0 2	Individual	Reg	Bak er			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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																		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.	

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																		North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of	

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																		the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to	

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																		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.	
1 3 2 2- 0 0 0 3	Individual	Reg	Bak er			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 3 5 0- 0 0 0 1	Individual	Joy	Bak er			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.								
1 3 5 0- 0 0 2	Individual	Joy	Bak er			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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											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.							important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land	and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley	

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																		was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing	

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																		flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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																		Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 5 0- 0 0 0 3	Individual	Joy	Bak er			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 3 7 3-	Individual	Patr icia	Bak er			Hou 5					The Hou5 Policy states, new park homes will only be supported on		No				Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

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0 0 0 1											existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.						environment for the local residents	improvement to the sites environment	
1 3 7 3- 0 0 0 2	Individual	Patricia	Baker			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	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. Total housing target of 11,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	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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											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.							supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates	SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point,	

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																		Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development	

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																		site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 7 3- 0 0 0 3	Individual	Patr icia	Bak er			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1 3 8 3- 0 0 0 1	Individual	Jane t	Bak er			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 3 8 3- 0 0 0 2	Individual	Jane t	Bak er			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have

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											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.						geography and drainage infrastructure .	Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to	regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport	

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																		Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not	

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1 3 8 3- 0 0	Individual	Jane t	Bak er			C4					The number of Canvey West homes puts residents in the East at risk with emergency		No				Development at West Canvey will impact emergency evacuation procedures	The safety of all Castle Point residents is a priority and has been considered within the	N

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03											evacuation procedures						for those residents living at East Canvey	Castle Point Plan	
0995-0001	Individual	mic hell e	bald win		Yes	SP3	No	canvey island is a flood risk area and they are proposing to build 3000+ houses, there is not enough infrastructure for the people who live there with the need for a third road being necessary	No	Justified	too many sites on canvey	less housing and more infrastructure	No	Not Ans wer ed	Not Ans were d		Floodrisk on canvey Third road	Flood risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the	N

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																		form of the SFRA and IDP, including in relation to Canvey. Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified	

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

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0 9 9 6- 0 0 0 1	Individual	Ge mm a	Ball		Yes	HA D4	No	This is an inappropriate question to ask someone whose background is not in local governance or planning policy. I cannot offer an opinion either way as to whether the plan is legally compliant.	No	Positively prepared	The definition of 'sound' provided states: "Positively prepared - provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". As a local resident, one of the needs of the area is very clearly improved infrastructure, specifically with regards to road lay-outs and traffic flow. There is constantly and consistently issues with traffic passing through Hadleigh. Focusing on the HAD4 development, [Redacted Personal Information]and so I have first hand experience of the roads immediately surrounding this proposed development, and have experienced these roads over the past three years. They are already not fit for purpose on a typical school run. The traffic is such that is regularly causes gridlocks	To make the plan sound, it would need to include suggestions, backed up by evidence, as to how the addition of 140 homes on Scrub Lane would not negatively impact the parents and children of Hadleigh Infants and Hadleigh Junior school, along with the homeowners in the surrounding roads. It would need to introduce alternative, free, areas of parking with sufficient spaces for the families of all children at the schools within a safe, close, walkable distance. It would also need to demonstrate that the addition of 140 new homes, which brings with it the families living in those homes and their children, could be factored into the current levels of traffic flow (particularly at peak times), acknowledging that there is currently gridlock in the surrounding roads on a very regular basis. Looking at school catchments, scrutiny of the school places would need to be included. Not only an assessment of how many additional school places would be required and how this would be catered for from a practical perspective, but also how the school catchment zones would need to be considered. As above, this would likely have left my son unable to get a place in any of the three closest schools to our house because of the layout of the catchment zones.	No	Not Ans wer ed	Not Ans were d	A	Objecting to HAD4: Traffic Parking for school parents and school places	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking for school parents and school places Unfortunately this is an matter of Essex County Council as the Education Authority to address.	N

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											and there are multiple, regular complaints form local homeowners to the schools about the traffic and parking, which often appear in the parents newsletters. The traffic is known to cause a lot of issues with local residents who live on Scrub Lane, Bilton Road, The Avenue, Church Road and Meadow Road, in particular. Scrub Lane is one of the primary places to park for Infants school parents as there is a large stretch of road, next to the proposed development site, which does not block driveways etc. Infants school parents try to be mindful of not causing chaos on Bilton Road (the front and main entrance to the Infants school) and do, where possible, park on Scrub Lane. For the moment, I am ignoring the impact of the additional 140 homes, purely								

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											looking at the current status of the roads; if this ability to park in Scrub Lane is removed it will cause undue detriment to the local residents surrounding the school, whilst also making it very difficult for parents to find free parking close to school. I do appreciate that the answer is "walk to school", however, my family is a prime example of why it is not always that simple [Redacted Personal Information] is not feasible for working parents who have to drop their children off at 8.45am whilst still being home, logged on to work at 9.00am. In this modern age where the cost of living is so high, both parents have to work and so driving is becoming somewhat of a necessity as parents literally run back out of school to make it home in time for								

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											work (for those of us who are lucky enough to work from home/hybrid working etc.). For the reasons above, I feel the proposed development not does not provide "a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs". To the contrary, it in fact worsens the current issues already experienced with parking and traffic flow and does nothing to provide any improvement. Now I wish to address school places; as I have eluded to above, my children were allocated to Hadleigh Infants school. I have provided my address as part of this consultation and so you will be able to look at the local schools and corresponding catchments. We applied to Westwood Academy, Thundersley Primary and Hadleigh Infants								

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											school. Westwood is a one form entry and is always over subscribed. We were not given a place despite this being the only school that we are technically in the catchment area for. Whilst we are not catchment for the other schools we applied as 'back-ups' being the next two closest school. I understand that Thundersley is also at capacity along with Hadleigh Infants. If you introduced 140 new homes right next to Hadleigh Infants school they would presumably be 'prime catchment', given the locality to that school. Had they existed at the time my children were applying to school, where would my children have been offered places? The suggestion of developing 140 homes right next to the school not only requires more school places in the area, but will also need consideration								

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											given to how this impacts the boundaries of school catchment zones. Taking this back to the question of, is the Draft Plan sound? Again, considering school placements, the answer has to be that it is not. The suggestion to develop these houses does not positively impact the areas objectively assessed needs. As above, it overburdens our schools and leaves children in the wider Hadleigh and surrounding areas at risk of not being allocated to local schools.								
1 1 6 4- 0 0 0 1	Individual	Sam anth a	Ball			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to	No	Justified, Consistent with National Policy	We 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	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.					Plan is 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,	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			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 site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermine d 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	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. <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	

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																	appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led 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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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		

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																		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.	
1 1 6 4- 0 0 0 2	Individual	Sam anth a	Ball			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 1 6 4- 0 0 0 3	Individual	Sam anth a	Ball			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 4 2 2- 0 0 0 1	Individual	Carl i	Ban nan		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 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 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 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, Hadleigh at 305. Total housing target of 11,000.					Failed to consider strategic alternatives like North West Thundersley 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. 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	<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.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	/ Grey Belt sites added, and the exclusion of the North West Thundersley site. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments.	
1 4 2 2- 0 0 0 2	Individual	Carl i	Ban nan		Yes	Had 2	Not Stat ed	I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agrees with this direction, as this would personally impact me, hugely decreasing the value and view of my home that backs on to this historic site that was	Not Sta ted			We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.					We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.	The Had2 Policy protects this Greenbelt site as not suitable for development	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
								purchased with the understanding the land was strictly used for agricultural training, with the castle itself becoming a monument and restrictions involve protecting the land as Green Belt and preventing housing developments (like those once proposed on Salvation Army land), preserving views, wildlife, and archaeological potential.											
0 0 6 9- 0 0 0 1	Individual	Elai ne	Barb er		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	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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																	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.		
1 3 9 8- 0	Individual	Keith	Barker		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und ?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 1																			
1 4 3 4- 0 0 0 1	Individual	Cart olin e	Bark er		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Supports the Castle Point Plan Draft and considers it to be legally compliant	Support noted	N
0 4 0 4 - 0 0 0 1	Individual	Jani ce	Barn es		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as 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	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				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. 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						"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 .	this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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	

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																		Thundersley was not preferred. <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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> 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	

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																		Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0 4 0 4 - 0 0 0 2	Individual	Jani ce	Barn es		Yes	C4	No				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 number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 7 9 2- 0 0 0 1	Individual	Am y	Bar nes		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0 5 1- 0 0 0 1	Individual	Joe	Bar nes		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So un d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 3 9 8 - 0 0 0 1	Individual	Meg an	Barr ett		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 3 7- 0 0 0 1	Individual	Mar k	Bart lett		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 4 4 8 - 0 0 0 1	Organisatio n	Davi d	Bart on	Traditi onal Verna cular Archit ectur e	Not Stated	D1	Not Stat ed	This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government. This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes. Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working. It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic	Not Sta ted		SECTION 1: Design Codes:- 1. Design Codes based on TVA should be utilised in preference to Design Guides 2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc. 3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds. 4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets),		Not Stat ed	Not Stat ed	Not Stat ed		Emphasises prioritising TVA design codes over guides, building recurring partnerships with consultation bodies, and preventing demolition of pre-1950s buildings to support climate goals. Calls for adoption of local lists of valued non-designated heritage assets, identification of existing action plans, and more flexible consultation processes. Strong focus on retaining and restoring Georgian, Victorian and Edwardian architecture, requiring new builds to use historic styles and local materials. Encourages local suppliers,	Noted	N

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								maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials. *One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above. Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.			which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing. 5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited). 6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the						artisan skills, volunteer assemblies, and streamlined planning processes. Where mixed eras exist, the predominant historic style should be used.		

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								Page 5 of 18 Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes. References to supporting documents are contained in the indented blue numbering. This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton. Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a			consultee’s consent to encourage wider consultation uptake moving forwards. 7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards. 8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of									

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								more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further. Community Campaigner David Barton: Community Campaigner David Barton is a Heritage Campaigner of over 11 years’ experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world. Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach			any one area, place or location. 9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term. 10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished Page 9 of 18 prized old buildings beloved								

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								its maximum potential as a historic town. Page 6 of 18 Mr. Barton should like to credit and thank the leading professionals and organisations that continue to support his TVA endeavours including: 1) Mr. Francis Shaw- Shaw & Jagger Architects 2) The King’s Foundation 3) Create Streets 4) Francis Terry & Associates 5) The Institute for Traditional Architecture This Submission is supported by the following appendices: i) Appendix i): Academic Perspective on Traditional Architecture by Mr. Francis Shaw of Shaw & Jagger Architects (PDF) ii) Appendix ii.) Written Endorsement from Mr. Joseph Jutras of The Institute of Traditional Architecture (PDF) 1. Appendix 1: Sefton Climate Emergency Strategy Climate Emergency Strategy 2. Appendix 2: Sefton 2023/2024 Climate Report modgov.sefton.gov.uk/documents/s124335/Climate+Emergency+Annual+Report+2023-2024+final.pdf 3. Francis Terry & Associates- The Secrets of Popular Architecture https://www.ftanda.co.uk/thoughts/secret-of-popular-architecture/ 4. Appendix 3: PAS Guide to better Sustainability Appraisal PAS Guide to better Sustainability Appraisal Local Government Association			by the community, such as community pubs, libraries and community centres. 11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US. 12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been								

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								5. Appendix 4: Sefton Council Annual Air Quality Report 2024 air-quality-status-report- 2024.pdf 6. Francis Terry & Associates- Natural Architecture Discussion https://www.ftanda.co.uk/thoughts/natural-architecture/ 7. Francis Terry & Associates- Sustainable Architecture Discussion (VIDEO) https://www.ftanda.co.uk/thoughts/what-is-sustainable-architecture/ 8. Francis Terry & Associates- Can Beautiful Homes be built in a Factory? https://www.ftanda.co.uk/thoughts/beautiful-homes/ 9. Create Streets- Design Codes Explanation design codes 10. Create Streets- Bootle Christ Church Project Bootle with Safe Regen 11. The King’s Foundation- Officer’s Mess Design Guide Rutland (PDF) 12. Create Streets- Lichfield Design Guide- Lichfield 13. Create Streets- Chatham Design Guide- Chatham Page 7 of 18 14. Create Streets- Street Assessment Service Street Assessment - Create Streets 15. Create Communities Mapping Platform Create Communities mapping platform - Create Streets 16. The King’s Foundation- BIMBY Toolkit Puts the power in your hands to influence new buildings in your area. 17. Francis Terry & Associates-			annihilated during the World Wars.											

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								Poundbury Discussion https://www.ftanda.co.uk/thoughts/poundbury/ 18. Institute of Traditional Architecture- Urban Planning Urban Planning – Institute of Traditional Architecture 19. Heritage and the Economy Historic England 20. The Economic Value of the Heritage Sector Heritage Counts Historic England; 21. Investing in Heritage to Avoid Embodied Carbon Emissions Heritage Counts 22. Historic England; 23. The Embodied Carbon Emissions of Construction and Retrofit Materials for Traditional Buildings Historic England 24. InYourArea- Community Campaigner David Barton- Placemaking Principles 2021 'Placemaking' is key to the future for Southport claims campaigner 25. InYourArea- Community Campaigner David Barton- Role of Traditional Town 2021 The role of the traditional town 'key' to Southport's future 26. Living with Beauty Report Example 76, Page. 177 Living with beauty: report of the Building Better, Building Beautiful Commission 27. InYourArea- Community Campaigner David Barton- Green Action Plan 2021 Former Councillor proposes climate change plan 28. InYourArea- Community Campaigner David Barton- Hedgerow Planting Benefits 2021 Campaigner calls for more											

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								green spaces in Southport 29. Benefits of Greenery Planting- The Guardian 2010 https://www.theguardian.com/environment/green-living-blog/2010/oct/14/carbon-footprint-house 30. Francis Terry & Associates- Glad to be Pastiche Discussion https://www.ftanda.co.uk/thoughts/glad-to-be-pastiche/ 31. Francis Terry & Associates- What is more important, Materials or Form? https://www.ftanda.co.uk/thoughts/rotonda-in-cheese/ 32. InYourArea- Community Campaigner David Barton- Lathom Hall Seaforth https://www.inyourarea.co.uk/news/restoration-of-seaforth-beatles-landmark-club-a-breakthrough-in-combatting-climate-crisis											

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1 4 4 8 - 0 0 0 2	Organisatio n	Davi d	Bart on	Traditi onal Verna cular Archit ectur e	Not Stated	D9	Not Stat ed		Not Sta ted		SECTION 2: Designated & Non- Designated Heritage Assets: 1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City. 2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds. 3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as “Memory Lane” featured on InYourArea		Not Stat ed	Not Stat ed	Not Stat ed		Advocates removal of modern street furniture, provision of grants and incentives for investors retaining old builds, pooling archives, and supporting community recognition of non-designat ed assets. Recommends incentives for third-party investors, remote engagement with property owners, defining character areas using authentic blueprints, conserving industry at historic complexes, and outreach to owners demolishing worship or landmark buildings. Suggests mandatory collaboration through community	Noted	N

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											Magazine to enrich existing material archives. 4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition. 5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community. 6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage						champions, reconstruction programmes, expanded risk checklists, and tailored funding packages. For conservation areas, calls for simplified listed building consent, enhanced historic appeal, incentives for lost decorative features, support for replica durable materials, prevention of misuse of modern designs, directories of TVA architects, establishment of new conservation areas, support for Blue Plaques, discretionary rate relief, and retention or reproduction of historic street furniture. On		

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											in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated. 7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the						historic buildings, proposes creation of designated/n on-designated lists, clearance of vegetation along railways, grant funding for exception areas, guidance on street furniture, rebuilding long-lost buildings on vacant sites, provision of archive blueprints, discretionary tax reductions, authentic suburban styles as compromise, reinstatement of fascia details, collaboration with foundries, banning carbuncle extensions, and financial support for traditional vernacular restoration. For		

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											“good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones. 8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc. 9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship. 10. Every effort must be made to reach out to Property Owners,						vernacular architecture, urges directories of trusted contractors, encouragement of TVA solid wall construction, simplified consent forms, heritage skills programmes, in-keeping extensions, adoption of historic layouts for new estates, timeless designs for housing expansion, infrastructure planning to avoid congestion, reinstatement of historic layouts, prevention of modern structures dividing communities, and protection of façades.		

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											especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area’s founding or history locally. 11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition. 12. Reconstruction Programme harnessing existing limited crafts people’s skillsets to be used as a fundraising vehicle to bring back buildings that may								

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											have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK. 13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain’s Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage. 14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that								

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											may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements. SECTION 3: Conservation Areas:- 1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc. 2. Highways & Street Furniture should be duly supported across									

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											the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise. 3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make								

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											Old Builds practical to own, live and work in the 2020s onwards. 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 decorative features must be provided by the Local Council. 4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis. 5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as								

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											stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area. 6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. 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 decorative features must be provided by the Local Council. 7. New									

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											Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones. 8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements. Page 12 of 18 9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively. 10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary								

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											financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA’s Climate Change Action Plan Targets. 11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents’ Groups, etc. 12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or								

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											the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts. SECTION 5: Historic Buildings:- 1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City. 2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to								

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											eradicate the perceived neglected aesthetic. 3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period. 4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to									

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											other Conservation Areas, etc. 5. Scheme to rebuild and reconstruct long- lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets. 6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a								

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											printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc. 7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through personal circumstances. 8. “Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may								

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											otherwise adversely impact on housing settlements. 9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place. Page 15 of 18 10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style. 11. Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style								

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											addition may be used to retain blending. 12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s. SECTION 6: Traditional Vernacular Architecture:- 1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for								

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											all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings. 2. These same people should be readily contactable for new construction 3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.								

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											4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015. 5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don't have the time to do this themselves or may be risk averse even. 6. Extensions- there must be a proactive emphasis on in- keeping structural fabric to prevent future errors, such as the Municipal								

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											Building depicted in the SPD being replicated again thereby harming the Conservation value. 7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s. Page 16 of 18 8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future. 9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk								

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											of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc. 10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today. 11. Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location. 12. Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said								

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											contemporary architecture is pursued.								
1 4 4 8 - 0 0 0 3	Organisatio n	Davi d	Bart on	Traditi onal Verna cular Archit ectur e	Not Stated	SD1	Not Stat ed		Not Sta ted		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		Not Stat ed	Not Stat ed	Not Stat ed		Flooding hotspots should be identified for emergency grant funding, with regional cooperation to prevent recurrent repairs.	Noted	N

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											emergency flooding to prevent costly consequential recurrent repairs.								
1 4 4 8 - 0 0 0 4	Organisatio n	Davi d	Bart on	Traditi onal Verna cular Archit ectur e	Not Stated	ENV 3					Biodiversity- maximise greenery along all arterial roads and commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.		Not Stat ed	Not Stat ed	Not Stat ed		Greenery should be maximised along arterial and commuter routes with tree planting and hedgerows, incentivising private owners.	Noted	N
1 4 4 8 - 0 0 0 5	Organisatio n	Davi d	Bart on	Traditi onal Verna cular Archit ectur e	Not Stated	SD5	Not Stat ed		Not Sta ted		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. 2. Retrofit Ventilation is a key point that should warrant future new		Not Stat ed	Not Stat ed	Not Stat ed		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,	Noted	N

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											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 dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area. 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						provision of sustainable materials directories or guides, and financial incentives to demolish carbon-poor towers to restore skylines.		

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											demolition. 4. A brick by brick case study of as many buildings as possible may warrant invitation of national and 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. 5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially Page 13 of 18 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								

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											restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council. 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.								
1 4 4 8 - 0 0	Organisatio n	Davi d	Bart on	Traditi onal Verna cular Archit ectur e	Not Stated	T1	Not Stat ed		Not Sta ted		Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a		Not Stat ed	Not Stat ed	Not Stat ed		Transport links should prioritise connecting Local Government spheres, especially	Noted	N

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06											Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.						weak connections like Southport with Lancashire.		
1448-0007	Organisation	David	Barton	Traditional Vernacular Architecture	Not Stated	ENV 2	Not Stated		Not Stated		Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.		Not Stated	Not Stated	Not Stated		Coastlines should be reclassified as SSSIs, especially underused beaches like Southport in Sefton.	Noted	N

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1 4 4 8 - 0 0 0 8	Organisatio n	Davi d	Bart on	Traditi onal Verna cular Archit ectur e	Not Stated	Wh ole Pla n	Not Stat ed		Not Sta ted		SECTION 7: Making an application:- 1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non- designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval. 2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020. 3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to		Not Stat ed	Not Stat ed	Not Stat ed		Recommends identifying recurring demolition applicants, imposing penalties for decline tactics, creating deterrent action plans, permitting temporary accessibility alterations, publicising pre-consultat ion, undertaking brick-by-brick analysis, locking feedback unless re-invited, forming partnerships with property owners of at-risk buildings, preventing urban explorers, and working closely with community champions and heritage groups. Miscellaneous points include supporting reconstructio	Noted	N

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											offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition. 4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike. 5. Full Pre- Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings. 6. Brick by brick						n of old builds (European/US examples), adopting unadopted roads, pre-approving conservation- style street furniture, providing archive access and waivers, supporting car parking freedom, designing parking abodes in keeping with heritage, publishing names of willing consultees, offering tours of traditional architecture, using meritocratic skillsets for emergency projects, creating top ten registers of buildings at risk, assessing infrastructure impacts such as air quality, and monitoring free car parking		

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											Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and Page 17 of 18 Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas. 7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based. 8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to						through proof of purchase.		

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											discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition. 9. Proactive effort to stop Breaking and Entering style of “Urban Explorers” who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020. 10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing								

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											these same groups and organisations (including the LA). SECTION 8: MISCELLAENOUS: - 1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage. 2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern. 3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area								

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											including installation, maintenance costs (where appropriate). 4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings. 5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness. 6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment. 7. Provide publicly published names of consultees								

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											willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc. 8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s. 9. Provide a focused effort on utilising people’s skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered									

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											bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties. 10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain. 11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.								

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											12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.								
0 9 0 9- 0 0 0 1	Individual	Han nah	Bart on- Bro wn		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 9 0 9- 0 0 0	Individual	Han nah	Bart on- Bro wn		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed		A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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02																			
0909-0003	Individual	Hannah	Barton-Brown		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered		A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1269-0001	Individual	Teresa	Barwick			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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.				Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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											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						"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	housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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)	

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																		outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 6 9- 0	Individual	Tere sa	Barv ick			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park									Policy HOU5 should make provision for improved site environment	Comments noted. Policy HOU5 does not restrict improvement to	N

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002								homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									for the local residents	the sites environment	
1269-0003	Individual	Teresa	Barvick			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0209-0001	Individual	Pauline	Basford		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no	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	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	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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											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						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	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</i>	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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											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.							<i>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>	
0 2 0 9- 0 0 0 2	Individual	Paul ine	Basf ord		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 2 0 9- 0 0 0 3	Individual	Paul ine	Basf ord		Yes	B8	No	This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CBC vision is to create an environment that promotes business on MTE, by removing a	Not Sta ted	Not Stated			No		No		This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120	Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states 'It is not	N

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								25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.									businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodat	the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.	

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																	ed on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs		

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																	a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.		

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0 9 0 7- 0 0 0 1	Individual	davi d	bass		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley with no credible five-year housing supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to	Add North West Thundersley site, 187Ha as a greenbelt, grey belt, brownfield site , option for 7500 homes Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 and Hadleigh at 305 Total housing target of 11,000	No	Not Ans wer ed	Not Ans were d	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. I do totally agree with the policy Had2, for the Hadleigh Farm area, which talks about this site as environmental, recreational,							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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											nature recovery (LNRS), biodiversity (APIBs), agricultural, farming activities, nature conservation, Site of Specific Scientific Interest, Ramsar site, East Coast Flyway World Heritage site, ecological restoration, habitat creation and connectivity. This site needs protection as an open space, promoting the heritage value with the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I concur that the Had2 policy is about protecting this greenbelt site as not suitable for development, with respect to urban sprawl, it is a buffer zone, the effect on the highways and traffic, the lack of infrastructure, protecting our farmland,							and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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											protecting the wildlife, out of character, open space, heritage, archaeology, promoting the historic links, and that we should use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. This is confirmed by the Housing Capacity Topic Paper - August 2025, which confirms sites GB8A&B are not Potential Grey Belt, with that the complete site or sub-areas are not recommended for further consideration. We need a C6 Policy for this farmland, the South Hadleigh Green Lung. The south Hadleigh Green Lung will be protected and enhanced as a strategic green infrastructure asset between Hadleigh and Leigh on Sea. Its key role will be connecting ecological networks,							again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North	

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											protecting its ecological value, provide a strategically important ecological corridor, securing a high level of biodiversity net gain, have no adverse impact on the integrity of nearby habitats sites, support the creation of new habitats, through Biodiversity Net Gain, Countryside Stewardship, to support the habitat priority measures, with the nature recovery strategy and as an area of particular Importance for Biodiversity. The Plan’s approach to biodiversity and environmental protection needs strengthening and developments should not proceed where it results in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. As stated in the agricultural land document date									West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the	

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											June 2025, just over twenty-one percent of Castle Point's land is in agricultural use, and the remaining agricultural areas in the Castle Point are increasingly fragile but contribute greatly to the Borough's character and will be important to preserve. Also, given that the purpose of preservation is long-term food security, the benefits of preserving agricultural land applies regardless. Once the graded agricultural land is lost to development, it is lost forever. This complete site should be included for neighbourhood plans and local green space designation. This is based on the listed assets of community value, visitors, conservation areas, registered historic site, local nature reserve, Sites of Special Scientific Interest,							natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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											footpaths and cycle routes, country parks, rural footpaths and nature trails, and public rights of way. This site has areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. I can fully support this policy Had2 with no housing development ever on this farmland site, but an unsound plan makes this site a high risk.							site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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1 3 0 0- 0 0 0 1	Individual	Sus an	Bas s			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 3 0 0- 0 0 0 2	Individual	Susan	Bass			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
1300003	Individual	Susan	Bass			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0925001	Individual	James	Bassett		Yes	Whole Plan	No		No	Justified			Yes	Not Answered	Not Answered	A	The Castle Point Plan is not sound or Legally Compliant	Comments noted.	N
0095001	Individual	Donna	Bateman		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not	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	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

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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.						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	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.	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 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.		
0 0 9 5- 0 0 0 2	Individual	Don na	Bate man		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 2 6 5- 0 0 0 1	Individual	Rich ard	Bate s		Not Stated	Had 4	Not Stat ed	Hi there, Hope you're keeping well! I am getting in touch to make a request if possible please? I would like to be informed of any previous applications to build on the Land South of Scrub Lane which is next to Hadleigh Infants and Nursery School. I am a local resident who wants to gain a full	Not Sta ted				Not Stat ed	Not Stat ed	No		Wishes to be notified about planning applications on Land South of Scrub Lane.	Planing applications are advertised locally in accordance with national regulations and can be checked on the Council's website here	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								understanding as to what these applications entailed (use, number of properties etc.) and why they were eventually rejected. Please feel free to send over any previous documentation relating to these proposals. Have a nice weekend and thanks in advance for your cooperation										https://www.castlepoint.gov.uk/find-planning-applications/	
0524-0001	Individual	Colin	Bates		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed							Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is	

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											for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							adopted, and from that point onwards. For further information please see housing topic paper. Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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																		natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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																		site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road 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	

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

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																		Local Transport Plan.	
0 5 2 4 - 0 0 0 2	Individual	Coli n	Bate s		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however	N

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											provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.						for local residents	included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes.	

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																		Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 2 4 - 0 0 0 3	Individual	Coli n	Bate s		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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											on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.								
0 9 9 0- 0 0 0 1	Individual	Rich ard	Bate s		Yes	HA D4	Yes		No	Justified	There is no justification for such an obscene number of properties being built on this small piece of land - even more so given previous failed attempts to push through similar projects in the past for far fewer homes. The impact this will have in terms of traffic locally and cars being parked on neighbouring streets is a huge concern in its own right. The environmental impact of this being built next to Hadleigh Infants and Nursery School with the playground so close by is also a		No	Not Ans wer ed	Not Ans were d		Objecting to HAD4: Traffic Impact of development on the school Engage with sport england to restore to playing pitch	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Development disruption Impact of any works will be mitigated by a construction environment management plan in accordance	N

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											major issue - particularly given the length of time this project would take to complete. This land should return to its initial state as a playing field or be considered as an opportunity to create further sport and recreation facilities as part of the Castle Point Playing Pitch Strategy. Local children attending Hadleigh Junior School and Hadleigh Infants and Nursery School would benefit hugely from the facility as well as residents, community groups and sports teams. Hadleigh has the potential to be considered a real leader, not just in terms of the Borough but County-wide, for local sport and recreation facilities and is passing up a huge opportunity. Why not consult Sport England or Fields in Trust on how we can transform this site and think							with policy SD6 to ensure that disruption is sufficiently mitigated. Loss of Playing Pitch Policy HAD4 includes mitigation for the loss of the playing field.	

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											about the longer-term benefits this would have for local residents, businesses and the community as a whole?								
0 8 5 1- 0 0 0 1	Individual	Nor man	Baxt er		Yes	HA D4	Yes		No	Positively prepared	Already heavy traffic on a what is a narrow road especially when an incident occurs on the London Road	A much smaller number of homes in keeping with other properties in Scrub Lane especially considering number of parking spaces for families with multiple cars Take note of overspill of cars from Scrub Mews parking in Scrub Lane and causing traffic chaos	No	Not Ans wer ed	Not Ans were d		Objects to HAD4 due to traffic on scrub lane	Traffic Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.	N
0 3 5 9- 0 0 0 1	individual	J	Bayl is			Wh ole Pla n	Yes		Yes							A	Castle Point Plan is sound and legally compliant.	Support noted.	N
1 4 4 0- 0 0 0 1	Organisatio n	Joes eph	Beal e	RSPB	Yes	ENV 1	Yes		Yes		There should be provision included to enable conservation organisations such as the RSPB to install any further predator exclusion	There should be provision included to enable conservation organisations such as the RSPB to install any further predator exclusion fences on West Canvey Marshes. They may potentially be considered to affect landscape character, but	No				There should be provision included to enable conservation organisations such as the RSPB to	Covered in supporting text to ENV5 rep	18.43 The hedgehog is now officially National Hedgehog

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											fences on West Canvey Marshes. They may potentially be considered to affect landscape character, but an exemption clause for reasonable, evidence-based use to enhance biodiversity should be provided in Policy to allow the RSPB - and others as appropriate - to continue important work for nature.	an exemption clause for reasonable use to enhance biodiversity should be provided in Policy.					install any further predator exclusion fences on West Canvey Marshes. They may potentially be considered to affect landscape character, but an exemption clause for reasonable, evidence-based use to enhance biodiversity should be provided in Policy to allow the RSPB - and others as appropriate - to continue important work for nature.		g Conserva tion Strategy, publishe d in October 2024. 'Conserv ation' fencing, such as predator exclusion fences installed on reserves by conserva tion organisat ions, may be exempt from the requirem ent, as appropri ate
1 4 4 0- 0 0 0 2	Organisatio n	Joes eph	Beal e	RSPB	Yes	DH 1	Yes		Yes			Please change 'fritillary' to Heath Fritillary butterflies in point 2 Please correct the typo 'heath' and alter to 'health' in point 4	No				Please change 'fritillary' to Heath Fritillary butterflies in point 2 Please correct the typo 'heath' and alter to 'health' in point 4	Agreed	Policy DH1 2. The Council will continue to support opportunities for restoration, enhance ment and

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																			creation of habitats in the area, particular ly priority habitats and habitats benefitin g protecte d/priority species including heath fritillary butterflie s, badgers and southern wood ants. 4. The area's recreatio nal role will be protecte d and enhance d with opportun ities for managed passive recreatio n, focusing on health, wellbeing and

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																			educatio n value.
1 4 4 0- 0 0 0 3	Organisatio n	Joes eph	Beal e	RSPB	Yes	SP4	Yes		No		There should be mention of developer RAMS contributions.	There should be mention of developer RAMS contributions.	No				There should be mention of developer RAMS contributions.	RAMs is covered by Policy ENV3(1b). However a cross reference can be added from the supporting text of SP4	New para 6.67 As set out in policy ENV3, develop ments may also be required to satisfy the requirem ents of the Habitats Regulati ons by making contribut ions as defined in the Essex Coast Recreati onal Disturba nce Avoidanc e and Mitigatio n Strategy (RAMS) or by the provision of sustaina

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																			ble accessib le natural greenspa ce (SANG) or SANG- like provision .
1 4 4 0- 0 0 0 4	Organisatio n	Joes eph	Beal e	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 invertibrates but also other species that are negatively affected, such as bats.	N
1 4 4 0- 0 0 0 5	Organisatio n	Joes eph	Beal e	RSPB	Yes	T2	Yes		No	Justified	Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked	It should be clarified in Policy that any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be	No				It should be clarified in Policy that any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need	Agreed. Mod proposed.	Policy T2 9. Any improve ments to accessin g Canvey Island must avoid any adverse effects on the integrity of Habitats

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											land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and biodiverse are, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.	detrimental to this important and biodiverse are, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.					to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and biodiverse are, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.		sites and minimise impacts on designated sites, priority habitats and species, including functionally linked land and habitat connectivity.

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1 4 4 0- 0 0 6	Organisatio n	Joes eph	Beal e	RSPB	Yes	C4	Yes		No	Justified, Consistent with national policy	Depending on where the 2000 new homes are located within this allocation, and the approach taken to the non-residential construction, there could be serious negative impacts on Canvey Wick Site of Special Scientific Interest (SSSI), including to key populations of Essex Local Nature Recovery Scheme (LNRS) Priority Species Nightingale and Shrill Carder Bee. There must be no increase in harmful recreational impacts on this SSSI or to the RSPB reserve. Paragraph 8.39 states the aim for Canvey Wick SSSI and West Canvey Marsh to help "provide recreation". Canvey Wick has experienced fires and other recreational damage in recent years, and this sensitive and important site must be safeguarded with a	The RSPB is greatly concerned about the plans in Policy C4 for a broad location next to Canvey Wick SSSI and near West Canvey Marsh RSPB reserve, especially the 2000 homes. Canvey Wick SSSI is nationally important for invertebrates, and important for species such as Nightingale, and therefore a source of pride for Castle Point. There is great responsibility for its appropriate treatment. We urge that any new housing be located at the eastern end of the broad location, well away from the vulnerable wildlife, and with business or industrial units separating new residential buildings from the SSSI. There should be no added lighting, pollution, and disturbance impacts. To avoid harm to the SSSI and West Canvey Marsh RSPB reserve, please clarify Policy C4 as follows: 1) Clarify that any new residential units (2000 homes) will be allocated to the eastern end of the broad location zone, well away from the SSSI and surrounding area, ideally outside a buffer zone of 400m; 2 Clarify that a substantial protective buffer zone to Canvey Wick SSSI will be applied, within which there would be no new residential development, ideally of 400m or more to reduce impacts from recreation and pets; 3) Clarify that any new development within the buffer zone and closer to the SSSI will be business or industrial units,	No				The RSPB is greatly concerned about the plans in Policy C4 for a broad location next to Canvey Wick SSSI and near West Canvey Marsh RSPB reserve, especially the 2000 homes. Canvey Wick SSSI is nationally important for invertebrates, and important for species such as Nightingale, and therefore a source of pride for Castle Point. There is great responsibility for its appropriate treatment. We urge that any new housing be located at the eastern end of the broad location, well away from the vulnerable	Concerns mostly accepted. Mods to policy proposed	~~9: Appropria te links into multi-functio nal green infrastructure to the west of the site whilst avoiding adverse harm to biodiversi ty through recreatio nal impacts, or other impacts arising from urban develop ment.~~ 9) A strategy that minimise s impacts upon the SSSI and does not impede LNRS aims of connecti vity; via sensitive consider

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											suitable buffer zone and other mitigation measures. Other issues affecting the site and its biodiversity include artificial light pollution, disturbance to wildlife, and nutrient deposition to the specialised nutrient-sensitive flora from dog waste. Measures to prevent new residential areas being built near the SSSI, and to discourage direct access onto the SSSI area from any new residential development that is built in the broad location, should therefore be implemented, and alternative green space for dog walking provided, but these are not yet specified in this Policy. Many recreational impacts, such as predation by domestic cats, will be lessened if the surrounding area to the SSSI is business or	and that these will not add pressures to the SSSI nor impede LNRS aims of connectivity; 4) Remove the "provide recreation" from Paragraph 8.39; 5) Specify that any new residential units will not encourage direct access onto the SSSI area; 6) Specify provision of well-designed alternative green space or park for dog walking, away from the SSSI, to help alleviate pressure on the designated site and surrounds; 7) Ensure implications of lighting and noise are fully mitigated for any new developments near to the SSSI and West Canvey Marsh to avoid causing harm, such as to the invertebrate features of the SSSI, as well as to bats. Low or zero lighting, timer use, sensors, and other measures, need to be applied on or around sites of high invertebrate/nature value, as there is considerable scientific evidence around the impact of artificial lighting on invertebrates. 8) Any development in this area should include enhancements that complement the designated features and features of interest of Canvey Wick SSSI. For example, any redevelopment of the adjacent area should factor in features that we will support increased biodiversity, in particular scarce and rare invertebrates. This can be done by including brownfield habitat within the development; green						wildlife, and with business or industrial units separating new residential buildings from the SSSI. There should be no added lighting, pollution, and disturbance impacts. To avoid harm to the SSSI and West Canvey Marsh RSPB reserve, please clarify Policy C4 as follows: 1) Clarify that any new residential units (2000 homes) will be allocated to the eastern end of the broad location zone, well away from the SSSI and surrounding area, ideally outside a buffer zone of 400m; 2 Clarify that a substantial protective		ation of siting, buffers, lighting and noise. Residential development should be located with suitable buffers and in less sensitive parts of the site to avoid adverse impacts 10) Enhance ments that comple ment the designat ed features and features of interest of Canvey Wick SSSI. Redevelo pment of the adjacent area

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											industrial units rather than residential (any new residential units should be situated towards the eastern end of the broad location), but this must be clarified in Policy and there must still be a careful approach. We strongly urge a substantial protective buffer zone to Canvey Wick SSSI, within which there would be no new residential development, ideally of 400m or more. This is partly to protect vulnerable, ground-nesting Nightingales, an LNRS Priority Species, which have an important population at the SSSI. Nightingales are a Red-listed species of conservation concern due to substantial declines in their national population of about 90% over the past 50 years. The national census, carried out in 2012 and	roofs, sandy planted areas/sandbanks, and use of waste material such as crushed concrete in gabion baskets, are all examples of this. 9) Development should also not impact on RSPB West Canvey Marsh; through water quality impacts, recreational disturbance, and habitat degradation. This is partly covered in the plan in Section 8.40: 'The nature conservation sites at west Canvey are however sensitive to recreational activities and urban development so it is important that the Master Plan deals with this in an appropriate manner'. This caution should be emphasised and enacted through precautionary measures such as those raised for Canvey Wick.					buffer zone to Canvey Wick SSSI will be applied, within which there would be no new residential development, ideally of 400m or more to reduce impacts from recreation and pets; 3) Clarify that any new development within the buffer zone and closer to the SSSI will be business or industrial units, and that these will not add pressures to the SSSI nor impede LNRS aims of connectivity; 4) Remove the "provide recreation" from Paragraph 8.39; 5) Specify that any new residential units will not encourage direct access onto the SSSI area;		should factor in features that we will support increased biodiversity, in particular scarce and rare invertebrates, via measures such as green roofs, brownfield habitat, sandy planted areas/sandbanks and use of waste material such as crushed concrete in gabion baskets. 10) Well-designed alternative green space or park for dog walking, away from the SSSI, to help

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											2013, revealed that fewer than 5500 singing males remain in the UK. Nightingales nest on or near the ground, therefore their eggs and young are at higher risk from ground predators and accordingly vulnerable to the man-made pressures of recreational disturbance and urbanisation effects. If housing is placed too close to the SSSI, long-term urbanisation impacts could arise, including disturbance from noise and artificial lighting, recreational disturbance and the serious pressure of predation by domestic cats that would arise from new residential development near the site. Experience from similar sites, such as the protection of important populations of heathland birds from the indirect effects of urban							6) Specify provision of well-designed alternative green space or park for dog walking, away from the SSSI, to help alleviate pressure on the designated site and surrounds; 7) Ensure implications of lighting and noise are fully mitigated for any new developments near to the SSSI and West Canvey Marsh to avoid causing harm, such as to the invertebrate features of the SSSI, as well as to bats. Low or zero lighting, timer use, sensors, and other measures, need to be applied on or around sites of high invertebrate/nature value,		alleviate pressure on the designated site and surrounds;

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											development in southern England, indicates that it is not usually possible to mitigate the acute impacts on vulnerable ground-nesting birds from housing located in close proximity to the protected sites. Based on our understanding of the available scientific evidence of cat roaming distances this can range from 360m to 2.4km, with fences and hedges presenting little obstacle to this. We consider that 400m would be an appropriate buffer for the SSSI to any new residential units; the evidence suggests that this would avoid most cats entering the SSSI, in addition to reducing the effects of other disturbance to breeding Nightingales and other species as a result of human recreational impacts. Given the above						as there is considerable scientific evidence around the impact of artificial lighting on invertebrates. 8) Any development in this area should include enhancements that complement the designated features and features of interest of Canvey Wick SSSI. For example, any redevelopment of the adjacent area should factor in features that we will support increased biodiversity, in particular scarce and rare invertebrates. This can be done by including brownfield habitat within the development; green roofs,		

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											comments, in the absence of written clarity in Policy C4, aspects of this Policy may not comply with: the Essex LNRS aims for Priority Species and enhancement and connecting Areas of Particular Importance for Biodiversity (APIB); the tests and robust policies set out in the National Planning Policy Framework (NPPF) in relation to developments in proximity to Sites of Special Scientific Interest (SSSIs); and Section 40 of the Natural Environment and Rural Communities Act 2006 on the duty of Councils to conserve and enhance biodiversity. In addition, Paragraph 174 of the NPPF states: “Planning policies and decisions should contribute to and enhance the natural and local environment by a) “protecting and						sandy planted areas/sandbanks, and use of waste material such as crushed concrete in gabion baskets, are all examples of this. 9) Development should also not impact on RSPB West Canvey Marsh; through water quality impacts, recreational disturbance, and habitat degradation. This is partly covered in the plan in Section 8.40: 'The nature conservation sites at west Canvey are however sensitive to recreational activities and urban development so it is important that the Master Plan deals with this in an		

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											enhancing...sites of biodiversity” and; d) “minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.” As it stands Policy C4 may be placing Canvey Wick SSSI, its designated features and other key wildlife of national importance, at increased risk.						appropriate manner'. This caution should be emphasised and enacted through precautionary measures such as those raised for Canvey Wick.		
1 4 4 0- 0 0 0 7	Organisatio n	Joes eph	Beal e	RSPB	Yes	C5	Yes		No	Justified, Consistent with national policy	Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked	Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and	No				Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal	See modifications proposed	2. This will be prepared in collabora tion with key partners including ECC, adjoining district and unitary councils,

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											land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes	biodiverse are, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.					impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes		Transport East, Natural England, Environment Agency, Governm ent departm ents such as the DfT, BEIS and MHCLG and relevant agencies as well as engagem ent with the local communi ty. 4. Options in the feasibility study for improve ments to access to Canvey Island must seek to minimise environ mental impacts and will be subject to Habitats

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																			Regulatio ns Assessm ent to ensure there is no adverse effect on integrity resulting harm to internatio nally protecte d sites.
1 4 4 0- 0 0 0 8	Organisatio n	Joes eph	Beal e	RSPB	Yes	C6	Yes		No	Justified, Consistent with national policy	There is no provision for well designed dog walking park in the area. This will take the pressure of the more sensitive sites and already pressured at West Canvey Marshes and Canvey Wick SSSI. There is also the opportunity to implement flower- rich and low- nutrient pollinator corridors and Nightingale scrub corridors, as per the Essex LNRS habitat and Priority Species measures. It is nonetheless good to see the Essex LNRS embedded in this and other Policies.	Add a sentence about creation of a well-designed dog-walking green space in the area. Add a sentence about the opportunity to implement flower- rich and low-nutrient pollinator corridors and Nightingale scrub corridors, as per the Essex LNRS.	No				There is no provision for well designed dog walking park in the area. This will take the pressure of the more sensitive sites and already pressured at West Canvey Marshes and Canvey Wick SSSI. There is also the opportunity to implement flower-rich and low- nutrient pollinator corridors and Nightingale scrub corridors, as per the Essex	Policy C6(5) already allows for opportunities to develop habitats for priority species, stating ' <i>Development proposals must be designed to enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</i> ' Nonetheless, mods could be included to further address the points about	8.56 Whilst most forms of develop ment cannot take place in this area due to the constrain ts around the port facilities, this is an area where further enhance ment of ecology through biodiversi ty net gain or through long term schemes

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																	LNRS habitat and Priority Species measures. It is nonetheless good to see the Essex LNRS embedded in this and other Policies. Add a sentence about creation of a well-designed dog-walking green space in the area. Add a sentence about the opportunity to implement flower-rich and low-nutrient pollinator corridors and Nightingale scrub corridors, as per the Essex LNRS.	trecreational routes, noting that land ownerships may be a constraint.	such as Countryside Stewardship would be encouraged by the Council. The Green and Blue Infrastructure Strategy identifies a long-term opportunity to establish a Country Park at the Green Lung and through this, there may be the possibility to establish a well-designed dog-walking green space in the area.
1 4 4 0- 0	Organisation	Joeseph	Beale	RSPB	Yes	B9	Yes		No	Justified	There are several positive points in this Policy, such as increased biodiversity and	It should be clarified how native scrub and low-nutrient grassland corridors will be enhanced or created, and how this can realistically function alongside	No				There are several positive points in this Policy, such	More detailed matters of site managementt can be drawn out in the	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 9											wildlife corridors. However, there is a risk of 'species rich' grassland that will be used, and nutrient-enriched, by dogs more than wildlife, or general non-native shrub planting. Given the importance of South Benfleet as an area with potential to provide connectivity following the principles of the Essex LNRS, it could be explained in Policy how these aims will be achieved whilst subject to recreational pressures.	areas with high densities of dogs. If this can be done, there is an excellent opportunity to enhance connectivity and biodiversity in this area. Paragraph b.36 is welcome. To increase flood storage, Castle Point can create ponds in existing low points on the site and connect with long grassland buffer zones.					as increased biodiversity and wildlife corridors. However, there is a risk of 'species rich' grassland that will be used, and nutrient-enriched, by dogs more than wildlife, or general non-native shrub planting. Given the importance of South Benfleet as an area with potential to provide connectivity following the principles of the Essex LNRS, it could be explained in Policy how these aims will be achieved whilst subject to recreational pressures. It should be clarified how native scrub and low-nutrient grassland	master plan. Point 3 of Policy B9 already addresses floo storage / <i>t should be clarified how native scrub and low-nutrient grassland corridors will be enhanced or created, and how this can realistically function alongside areas with high densities of dogs. If this can be done, there is an excellent opportunity to enhance connectivity and biodiversity in this area. Paragraph b.36 is welcome. To increase flood storage, Castle Point can create ponds in existing low points on the site and connect with long grassland buffer zones.</i>	

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																	corridors will be enhanced or created, and how this can realistically function alongside areas with high densities of dogs. If this can be done, there is an excellent opportunity to enhance connectivity and biodiversity in this area. Paragraph b.36 is welcome. To increase flood storage, Castle Point can create ponds in existing low points on the site and connect with long grassland buffer zones.		
1 4 4 0- 0 0 1 0	Organisatio n	Joes eph	Beal e	RSPB	Yes	B8	Yes		No	Justified	We suggest more detail can be provided around urban biodiversity enhancements.	Policy B8 can be improved by including: Brownfield habitat within the development; green roofs, sandy planted areas/sandbanks, use of waste material such as crushed concrete in gabion baskets are examples of this; Small additions; Swift boxes, sandy flower beds with well though through planting for	No				Suggest more detail can be provided around urban biodiversity enhancements. Policy B8 can be improved by including: Brownfield	More detailed matters of site managementt can be drawn out in the master plan. Swift boxes already covered by Policy ENV5	N

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												pollinators, some green roofs on large retails units, increased tree and shrub cover where appropriate; The Beth Chatto housing estate can be used as a possible model – dry gardens with planting of native (and potentially non-native) plants.					habitat within the development; green roofs, sandy planted areas/sandbanks, use of waste material such as crushed concrete in gabion baskets are examples of this; Small additions; Swift boxes, sandy flower beds with well though through planting for pollinators, some green roofs on large retails units, increased tree and shrub cover where appropriate; The Beth Chatto housing estate can be used as a possible model – dry gardens with planting of native (and potentially non-native) plants.		

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1 4 4 0- 0 0 1 1	Organisatio n	Joes eph	Beal e	RSPB	Yes	C3	Yes		No	Justified	Currently this Policy does not factor in features that will support increased biodiversity, in particular scarce and rare invertebrates, nor the risk of any recreational disturbance in the case of redevelopment of the port (Paragraph 8.31).	Any redevelopment of the port should factor in features that will support increased biodiversity in particular scarce and rare invertebrates, to align with Essex LNRS aims and the Thames Estuary North Important Invertebrate Area. This can be done by taking the opportunity to include brownfield habitat within the development; green roofs, sandy planted areas/sandbanks, use of waste material such as crushed concrete in gabion baskets are examples of this, and buffer zones of low-nutrient substrates and scrub. The potential mitigation for any recreational disturbance should feature in Section 8.31 in the case of redevelopment of the port.	No				Currently this Policy does not factor in features that will support increased biodiversity, in particular scarce and rare invertebrates, nor the risk of any recreational disturbance in the case of redevelopment of the port (Paragraph 8.31). Any redevelopment of the port should factor in features that will support increased biodiversity in particular scarce and rare invertebrates, to align with Essex LNRS aims and the Thames Estuary North Important Invertebrate Area. This can be done by taking the opportunity to include brownfield	Part a of the existing policy states 'The design of the proposed development must not cause significant harm to the landscape or environmental assets, having regard to the scale of existing development on the site;' Part e notes the imporatnce of compliance with ENV3 which covers recreational disturbtance to international sites and biodiversity net gain (although all policies in the Plan should be read as a whole).	N

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																	habitat within the development; green roofs, sandy planted areas/sandbanks, use of waste material such as crushed concrete in gabion baskets are examples of this, and buffer zones of low-nutrient substrates and scrub. The potential mitigation for any recreational disturbance should feature in Section 8.31 in the case of redevelopment of the port.		

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1 4 4 0- 0 0 1 2	Organisatio n	Joes eph	Beal e	RSPB	Yes	SP3	Yes		No	Justified	Brownfield land needs to be clarified here and elsewhere in the Local Plan, to make it explicit that it is non-biodiverse brownfield land that will be targeted for development. Brownfield sites within Castle Point such as Canvey Wick SSSI and parts of the wider Thames Estuary North Important Invertebrate Area illustrate how biodiverse soem brownfield land can be, and Policy must be clear that such areas are not under threat of development, but rather only the species-poor brownfield sites. 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	To slightly amend wording in this Policy, such as 3a and Paragraph 6.34, to clarify "non-biodiverse" brownfield land is the focus for development. Also to amend wording accordingly throughout the Local Plan document.	No				Brownfield land needs to be clarified here and elsewhere in the Local Plan, to make it explicit that it is non-biodiverse brownfield land that will be targeted for development. Brownfield sites within Castle Point such as Canvey Wick SSSI and parts of the wider Thames Estuary North Important Invertebrate Area illustrate how biodiverse soem brownfield land can be, and Policy must be clear that such areas are not under threat of development, but rather only the species-poor brownfield sites. The Essex LNRS mentions	Noted	N

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											space for nearby communities and a refuge for a variety of priority invertebrates. 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.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' And in addition, 8.2 Grassland and							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 invertebrates. 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		

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											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).'						wider environment. Monitor biodiversity on brownfield sites as they can often become important habitats for invertebrates and early successional communities. ' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' And in addition, 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		

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																	sites and previously developed land (brownfield).' To slightly amend wording in this Policy, such as 3a and Paragraph 6.34, to clarify "non-biodiverse" brownfield land is the focus for development. Also to amend wording accordingly throughout the Local Plan document.		
1 4 4 0- 0 0 1 3	Organisatio n	Joes eph	Beal e	RSPB	Yes	Had 2	Yes		No	Not Stated	Policy Had2 – This Policy is welcome, but there needs to be a consideration for minimising recreational disturbance on priority/sensitive habitats. there is the opportunity to implement pollinator and Nightingale corridors, via scrub and flower-rich grassland.	This Policy is encouraging and there is much that is positive, but there needs to be Policy consideration for mitigating recreational disturbance on priority/sensitive habitats.	No				Policy Had2 – This Policy is welcome, but there needs to be a consideration for minimising recreational disturbance on priority/sensitive habitats. there is the opportunity to implement pollinator and Nightingale corridors, via	Conserving and enhancing the network of priority habitats is covered by ENV3c. Th eplan policies need to be read as a whole.	N

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																	scrub and flower-rich grassland. This Policy is encouraging and there is much that is positive, but there needs to be Policy consideration for mitigating recreational disturbance on priority/sensitive habitats.		
1 4 4 0- 0 1 4	Organisatio n	Joes eph	Beal e	RSPB	Yes	ENV 5	Yes		No	Justified	Policy ENV5 – We welcome the inclusion of Swift bricks in Point 1. Swift bricks or boxes can be in clusters of >3 as they are a communal species, where practical to do so. Larger industrial or commercial units should be expected to contribute more boxes overall than smaller residential developments. There also needs to be Policy around renovation work to ensure no loss of nest sites. Point 2 needs a clause added to exempt conservation fencing - such as	Point 1: wording to be added to account for the disparity in contribution possible for commercial and larger developments. Suggested changes: Wording to clarify for Minor Developments, classed as up to 9 residential units or less than 1,000 square metres of commercial floorspace, the minimum number of swift bricks (or boxes) needed is: • residential developments - three bricks, or two per dwelling, whichever is the greater. • commercial developments - three bricks, or one per 50 square metres of floorspace, whichever is the greater. Major developments, classed as 10+ residential units or 1,000 square metres or more of commercial floorspace. For major developments the County Ecologist will recommend specific requirements. We recommend adding wording	No				Policy ENV5 – We welcome the inclusion of Swift bricks in Point 1. Swift bricks or boxes can be in clusters of >3 as they are a communal species, where practical to do so. Larger industrial or commercial units should be expected to contribute more boxes overall than smaller residential developments. There also needs to be Policy around renovation	This policy specifically addresses the three species identified in NPPF para 187(d). Mods proposed.	Addition to Supporti ng text 18.42 and the Council's commitm ent to nature conserva tion, local policy has addresse d this issue. The policy stipulate s an average of at least one Swift brick/bo

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											the RSPB putting up a predator exclusion fence on our West Canvey reserve. Point 3. Low/no lighting needs to be considered on or around sites of high invertebrate/nature value.	such as: "renovations and refurbishments must not result in loss of nest sites, and any losses should be replaced on a like-for-like basis." Recommend Swift boxes be in clusters of >3 where practical to do so, as they are a communal species. Point 2: add a clause such as: "with exemptions for conservation fencing where appropriate". This would help the RSPB or other conservation organisations, for example when putting up a predator exclusion fence on our West Canvey reserve. Point 3. Suggest adding the wording: "There should be consideration of low or zero lighting around sites of high invertebrate/nature value, reflecting the substantial body of evidence around the impacts of artificial lighting on invertebrates. In addition, in relation to Point 3, reference to the invertebrate interest on Canvey/in Castle Point and its importance in providing valuable ecosystem services (pollination, crop production, waste disposal, soil health, etc) could be included somewhere in this Policy. Also for the importance of coastal grazing marsh as a habitat for its flood storage benefits and unique ecology.					work to ensure no loss of nest sites. Point 2 needs a clause added to exempt conservation fencing - such as the RSPB putting up a predator exclusion fence on our West Canvey reserve. Point 3. Low/no lighting needs to be considered on or around sites of high invertebrate/nature value.		x per dwelling/unit, so where practical to do so they can be in clusters of greater than 3, since Swifts are a communal species. 18.43 The hedgehog is now officially National Hedgehog Conservation Strategy, published in October 2024. 'Conservation' fencing, such as predator exclusion fences installed on reserves by

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																			conserva tion organisa tions, may be exempt from the requirem ent, as appropri ate
1 4 4 0- 0 0 1 5	Organisatio n	Joes eph	Beal e	RSPB	Yes	Infr a4	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	Para 19.52 shows that a significant proportion of the open space will be accessible natural greenspace which will be designd according to site and local circumstances.	N

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																	Essex LNRS principles, via scrub and flower-rich grassland.		
1 4 4 0- 0 0 1 6	Organisatio n	Joes eph	Beal e	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 shorebirds.	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 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	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 they have done in the Blackwater Estuary. Recharging Canvey Point would be an	Noted	N

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											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.						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.		

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1 4 4 0- 0 0 1 7	Organisatio n	Joes eph	Beal e	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 invertebrates. Also 14. Understand existing local habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an	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				Contaminate d 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 acknowledge d 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	Noted	N

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											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.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' 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).'							invertebrates. 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.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain		

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																	mosaic of habitats within them by rotational clearance of vegetation.' 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).' 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."		

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1 4 4 0- 0 0 1 8	Organisatio n	Joes eph	Beal e	RSPB	Yes	ENV 2	Yes		No	Justified	The RSPB welcomes e) enhancing networks , and the mention of the Essex LNRS guidelines and APIBs. Recreational disturbance needs to feature in this Policy. Policy needs to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR/SSSI are mitigated for and covered by an HRA. There is the option to explore opportunities for coastal adaptation measures and Beneficial Use of Dredged Sediment (BUDS), for example saline lagoon creation. Enhancing coastal areas for biodiversity should be specified.	Policy ENV2 should specify the need to address recreational disturbance and to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR/SSSI are mitigated for and covered by an HRA. It is suggested to add wording such as: "Explore opportunities for coastal adaptation measures and Beneficial Use of Dredged Sediment (BUDS), for example through saline lagoon creation. Policy should specifically include reference to enhancing coastal areas for biodiversity.	No				The RSPB welcomes e) enhancing networks , and the mention of the Essex LNRS guidelines and APIBs. Recreational disturbance needs to feature in this Policy. Policy needs to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR /SSSI are mitigated for and covered by an HRA. There is the option to explore opportunities for coastal adaptation measures and Beneficial Use of Dredged Sediment (BUDS), for example saline lagoon	Recreational disturbance and RAMS is covered in policy ENV3. Policy ENV2 parts 5 and 6 cover biodiversity, please see proposed mods	6. Develop ment proposal s must ensure areas that are identified as an Area of Particula r Importan ce for Biodivers ity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS), and priority habitats such as coastal floodplai n grazing marsh, mudflats and coastal saltmars h are protecte d and where possible enhance d. 7. Proposal

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																	creation. Enhancing coastal areas for biodiversity should be specified. Policy ENV2 should specify the need to address recreational disturbance and to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR /SSSI are mitigated for and covered by an HRA. It is suggested to add wording such as: "Explore opportunities for coastal adaptation measures and Beneficial Use of Dredged Sediment (BUDS), for example		s for flood defence improve ments should seek to deliver biodivers ity benefits alongsid e flood protectio n.

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	through saline lagoon creation. Policy should specifically include reference to enhancing coastal areas for biodiversity.		
1 4 4 0- 0 0 1 9	Organisatio n	Joes eph	Beal e	RSPB	Yes	ENV 3	Yes		Yes		We welcome this Policy.	We welcome this Policy. We suggest that the possible development of a biodiversity enhancement toolkit for developments could prove useful.	No				We welcome this Policy. We suggest that the possible development of a biodiversity enhancement toolkit for development s could prove useful.	Noted	N
1 4 4 0- 0 0 2 0	Organisatio n	Joes eph	Beal e	RSPB	Yes	GB2	Yes		No	Justified	Our comment on Policy GB2 is around the need to clarify that biodiverse brownfield and open mosaic habitat on previously developed land is exempt. 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 —	A sentence needs to be added to Policy GB2 to clarify that biodiverse brownfield and open mosaic habitat on previously developed land will not be considered appropriate for new development.	No				Our comment on Policy GB2 is around the need to clarify that biodiverse brownfield and open mosaic habitat on previously developed land is exempt. The Essex LNRS mentions repeatedly the potential for brownfield sites to be biodiverse	2018 Green Belt Assessments still form part of the evidence and considered wider areas.	N

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											‘disused developed land’ can serve as both a valuable wild space for nearby communities and a refuge for a variety of priority invertebrates. 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.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of						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. 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		

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											vegetation.' 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).'						can often become important habitats for invertebrates and early successional communities.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' 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).'		

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																	added to Policy GB2 to clarify that biodiverse brownfield and open mosaic habitat on previously developed land will not be considered appropriate for new development.		
1 4 4 0- 0 0 2 1	Organisatio n	Joes eph	Beal e	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 planting of native (and potentially non-native) plants, could be referenced.	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 addition. The Beth Chatto housing estate model – dry gardens with planting of native (and potentially non-native)	Noted	N

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																	plants, could be referenced.		
1 4 4 0- 0 0 2 2	Organisatio n	Joes eph	Beal e	RSPB	Yes	E1	Yes		No	Justified	These sites could have extensive provision to accommodate brownfield habitat enhancements that will improve these large sites for biodiversity and reduce management costs.	We suggest adding provision for brownfield habitat enhancements across the sites. For example, adding to 2d) to read: "Provide brownfield habitat enhancements, and environmental improvements such as to the quality of open spaces, landscaping, roads, drains, and communication infrastructure;	No				These sites could have extensive provision to accommodat e brownfield habitat enhancement s that will improve these large sites for biodiversity and reduce management costs.	Noted	N
1 4 4 0- 0 0 2 3	Organisatio n	Joes eph	Beal e	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 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	Brownfield should be identified as potentially being high biodiversity (as per the Essex LNRS). Development on such land 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.	No				Brownfield should be identified as potentially being high biodiversity (as per the Essex LNRS). Development on such land 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	Noted	N

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											development design.						residents and work. Policy SP2 should indicate that habitats and biodiversity will factor into development design.		
1 4 4 0- 0 0 2 4	Organisatio n	Joes eph	Beal e	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	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 would make a big difference. Another addition to this Policy 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.	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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											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 shown on this map, or whether a site is in or out of management. Brownfield as potentially biodiverse land could be mentioned.	Page 21 map - the key is confusing with regards to ancient woodland. The 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.					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		

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																	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.		
1 4 4 0- 0 0 2 5	Organisatio n	Joes eph	Beal e	RSPB	Yes	Thu n4	Yes		Yes		Some thought needs to be given to the recreational impact on the grasslands and SN Ancient Woodlands. Dogs and mountain bikes are a considerable issue in the woodlands some of which are SSSIs. There is opportunity here to implement pollinator and Nightingale corridors through creation of scrub and flower-rich/low-nutrient grassland.	Some thought needs to be given to the recreational impact on the grasslands and SN Ancient Woodlands. Dogs and mountain bikes are a considerable issue in the woodlands some of which are SSSIs. There is opportunity here to implement pollinator and Nightingale corridors through creation of scrub and flower-rich/low-nutrient grassland.	No				Some thought needs to be given to the recreational impact on the grasslands and SN Ancient Woodlands. Dogs and mountain bikes are a considerable issue in the woodlands some of which are SSSIs. There is opportunity here to implement pollinator and Nightingale corridors through creation of scrub and	Noted	N

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																	flower- rich/low- nutrient grassland.		
0 8 1 7- 0 0 0 1	Individual	Vivi enn e	Bea mis h		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 5 4 2 - 0 0 0 1	Individual	Jane t	Bear d		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five- year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park H031. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermine d to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to	5YHLS 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	N

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											The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would						be included in the plan.	we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position	

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											obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley	

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																		was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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;	

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																		Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt	

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

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

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																		projects identified in the Local Transport Plan.	
0 5 4 2 - 0 0 0 2	Individual	Jane t	Bear d		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however	N

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											provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.						for local residents	included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes.	

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																		Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 4 2 - 0 0 0 3	Individual	Jane t	Bear d		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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											on this matter has been published and the meetings were poorly adve1iised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.								

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0 6 0 5 - 0 0 0 1	Individual	Keith	Bear d		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0605-0002	Individual	Keith	Bear		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 6 0 5 - 0 0 0 3	Individual	Keith	Bear d		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
0 1 8 2- 0 0 0 1	Individual	Patricia	Beasley		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.	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	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

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											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.						predetermine d 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	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.	circumst ances, landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																	evacuation procedures.		
0 1 8 2- 0 0 0 2	Individual	Patr icia	Bea sley		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
1 0 2 2- 0 0 0 1	Individual	Lisa	Bea sley		Yes	Wh ole Pla n	Yes		Yes	Consistent with national policy			Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant	Support noted.	N
0 4 3 4 - 0 0 0 1	Individual	Jacq ueli ne	Bee ch		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 3 5 - 0 0 0 1	Individual	Stev e	Bee ch		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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1 0 2 0- 0 0 0 1	Organisatio n	Mar k	Beh ren dt	Home Build ers Feder ation	Yes	DTC	No	As the council will be aware paragraph 33a of the Planning and Compulsory Purchase Act 2004 requires the council to engage with the relevant bodies to maximise its actives – one of which is the preparation of development plans. The NPPF reiterates the importance of strategic planning across boundaries and provides further guidance on how to demonstrate compliance, stating in paragraph 26 that Councils should prepare and maintain one or more statements of common ground documenting the cross cutting matters being addressed and progress in cooperating to address these. However, no evidence appears to have been published as to how the Council has met the duty to co-operate. The Council do state in the Housing Capacity Topic Paper that they have had discussion with their neighbouring authorities, but without any other detailed evidence the only conclusion that can be reached at pre-sent is that the council have failed in their duty to co-operate.	No				Yes	Not Ans wer ed	Yes	A	Lack of Duty to Cooperate	Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met.	N

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1 0 2 0- 0 0 0 2	Organisatio n	Mar k	Beh ren dt	Home Build ers Feder ation	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 importance with regards nature and biodiversity with	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.	Yes	Not Ans wer ed	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. 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.	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 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	N

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											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						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 to maximise the benefits. Rather than being used as	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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											consistent with the NPPF, 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.						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: Supporting the delivery of the Essex Local Nature Recovery		

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																	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. 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		

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																	in the Strategy and focusing any delivery of biodiversity net gains to those areas that hold the greatest potential to deliver benefits for nature.		
1 0 2 0- 0 0 0 3	Organisatio n	Mar k	Beh ren dt	Home Build ers Feder ation	Yes	SP3	No		No	Positively prepared, Justified, Effective, Consistent with national policy	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		Yes	Not Ans wer ed	Yes	A	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	<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	N

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											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. 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. 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								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. 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. Protecting public open			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. 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. Protecting public open	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. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Sequential and Exception Test for Flood Risk</u> is covered in the SFRA, which will be supported by further clarifications. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments.	

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											exceptional circumstances stating that they “include but 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						space: HBF object to the Council's reference to shortfalls in Borough wide open space, as any loss can be mitigated. 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 contradiction s 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. Dispute Housing Capacity Topic Papper conclusion		

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											and had discussions with neighbouring authorities to ascertain whether they could meet any other housing needs. 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 accommodating some of Castle Point’s needs it is difficult to say as no evidence on the duty to co-operate						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.Sugge s this contradicts the Transport Assessment Scoping Document: Site specific constraints: Suggest they can be overcome and many green belt sites are preferable to allocated sites in respect of the sequential test. Conclusion on the housing requirement in SP3 HBF			

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											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. It is therefore justified for the Council to review its Green Belt and						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.		

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											consider whether exceptional circum-stances 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 purposes of the remaining Green Belt. 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										

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											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. 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								

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											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. Other footnote 7 constraints. 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. NERC Act Requirements and “Strategic Creation Opportunities” The Council state that as part of the duty to conserve and enhance biodiversity placed									

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											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 “do not								

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											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 protected 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								

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											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. Protecting public open space. 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 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								

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											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. 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								

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											im-proved open spaces in Castle Point. Sustainable Access 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 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								

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											would not be possible to address the impact arising from any of the potential development sites located in the Green Belt. The Councils 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: “It is considered that all of the CfS sites have the								

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											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”. 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								

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											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. Site specific constraints. 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 the development proposed by the Council is on									

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											Canvey Island which is wholly within Flood Zone 3 com-pared 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. Conclusion on the housing requirement in SP3 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								

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											justify adopting the proposed spatial strategy which does not, de-spite 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 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.								

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											Housing trajectory and supply 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 pan will therefore need to be modified to include a trajectory. 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 Councils spatial strategy which allocates a number of sites that are not currently available								

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											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 considers it to be a re-flection 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. HBF are also concerned that								

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											event he 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								

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											and an upper quartile rate of 188 dpa. 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. 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: “The approach is designed to ensure that areas at little or no risk of flooding from any source are									

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											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 lowest risk areas, ...” The approach taken by the Council, which discounts Green Belt in lower risk									

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											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 nt 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								

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											to 4,196 – a shortfall of circa 7,500 homes. 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 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. 5 year housing land supply Based on the Council’s housing trajectory in the Housing Topic Paper, the Council will not have a five year land supply on adoption.								

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											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. Conclusion on land supply 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								

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											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 new evidence ca be provided to show that they will be available they should not be allocated.								
1 0 2 0- 0 0 4	Organisatio n	Mar k	Beh ren dt	Home Build ers Feder ation	Yes	TH UN 5	No		No	Justified	Both of these policies seek to prevent the intensification of development in these areas. The council acknowledge in paragraphs 11.34 and 12.13 that this is the case but consider it necessary to provide additional protections in the		Yes	Not Ans wer ed	Yes	A	Both of these policies seek to prevent the intensificatio n of development in these areas. The council acknowledge in paragraphs 11.34 and 12.13 that this is the case but	The council considers it necessary to provide additional protections to prevent urban sprawl and coalescence and maintain the openness of this area	N

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											local plan but provide no other justification for these policies. Given that both of these areas are also designated as Green Belt it is not necessary for there to be additional policies in place with regard the coalescence of settlements. As such they should both be deleted.						consider it necessary to provide additional protections in the local plan but provide no other justification for these policies. Given that both of these areas are also designated as Green Belt it is not necessary for there to be additional policies in place with regard the coalescence of settlements. As such they should both be deleted.		
1 0 2 0- 0 0 5	Organisatio n	Mar k	Beh ren dt	Home Build ers Feder ation	Yes	GB2	No		No	Consistent with national policy	Part b. of this policy sets out the policy position in relation to grey belt and how this will be considered. However, NPPF notes that in the glossary that whilst grey bet can be PDL it is also defined as other land that does not strongly contribute to the purposes a, b or d of paragraph 146. Therefore, it	See above	Yes	Not Ans wer ed	Yes	A	Part b. of this policy sets out the policy position in relation to grey belt and how this will be considered. However, NPPF notes that in the glossary that whilst grey bet can be PDL it is also defined as	The Council has undertaken a Green Belt Review in accordance with the requirements of the Government s guidance. After a thorough review, backed up by strong	N

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											would be appropriate for the title of the policy to be amended to “Grey belt and Previously Developed Land in the Green Belt” to ensure that this is clear. Part b. is also inconsistent with NPPF in stating that land identified as grey belt will not undermine the purposes of including land within the Green Belt. Paragraph 155 of the NPPF states that land is not appropriate where “the development would utilise grey bet and would not fundamentally undermine the purposes taken together of the remaining Green Belt across the plan area”. If a parcel of land is considered to be grey belt, then it is not strongly meeting purposes of a, b or d and the test with regard to it be not inappropriate relates to whether it fundamentally						other land that does not strongly contribute to the purposes a, b or d of paragraph 146. Therefore, it would be appropriate for the title of the policy to be amended to “Grey belt and Previously Developed Land in the Green Belt” to ensure that this is clear. Part b. is also inconsistent with NPPF in stating that land identified as grey belt will not undermine the purposes of including land within the Green Belt. Paragraph 155 of the NPPF states that land is not appropriate where “the development would utilise grey bet and		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,	

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											undermines the purposes of green belt across the borough. HBF suggests the policy should be amended to reflect national policy.						would not fundamentally undermine the purposes taken together of the remaining Green Belt across the plan area”. If a parcel of land is considered to be grey belt, then it is not strongly meeting purposes of a, b or d and the test with regard to it be not inappropriate relates to whether it fundamentally undermines the purposes of green belt across the borough. HBF suggests the policy should be amended to reflect national policy.	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.	

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1 0 2 0- 0 0 0 6	Organisatio n	Mar k	Beh rend t	Home Build ers Feder ation	Yes	ENV 3	No	See comments on DtC and SA	No	Justified, Consistent with national policy	Part 1a of this policy states it will seek to secure nature recovery and biodiversity net gain by “Applying the principles related to the biodiversity hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy. In Castle Point, ancient woodlands are considered to constitute irreplaceable habitats”. HBF are concerned that in putting consideration of the biodiversity hierarchy along- side the consideration of irreplaceable habitats the will create confusion in the application of this policy. The delivery of BNG is a separate and different consideration to those related to protected species and habitats and should be kept separate within policies. HBF would therefore recommend that		Yes	Not Ans wer ed	Yes	A	Part 1a of this policy states it will seek to secure nature recovery and biodiversity net gain by “Applying the principles related to the biodiversity hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy. In Castle Point, ancient woodlands are considered to constitute irreplaceable habitats”. HBF are concerned that in putting consideration of the biodiversity hierarchy along-side the consideration of irreplaceable habitats the will create confusion in	Biodiversity hierarchy comment noted. BNG: As set out in paragraph 18.29 'Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites The 20% BNG target aligns with the wider Essex ambitions for 20% Biodiversity Net Gain to support nature recovery and delivery of the Local Nature Recovery Strategy for Essex'. 20% is supported by Natural England and the results of the Plan Reg 18 consultation. It has also been subject to viability testing.	N

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											mention of the biodiversity hierarchy is removed from part 1a. HBF does not consider the requirement in 2d for development on greenfield sites to deliver 20% BNG to be sound. Guidance in paragraph 74-006-20240214 of PPG states that: “... plan-makers should not seek a higher percentage than the statutory objective of 10% bio-diversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be						the application of this policy. The delivery of BNG is a separate and different consideration to those related to protected species and habitats and should be kept separate within policies. HBF would therefore recommend that mention of the biodiversity hierarchy is removed from part 1a. Objects to BNG 20% requirment and the evidence for it.		

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											implemented”. As such the starting point is that local plan should not seek a higher requirement. This is different to a per-missive policy allowing local plans to seek a higher level of BNG where justified, and the HBF would argue that it should be considered a high bar with regard to the evidence required to justify such a policy. There must be very robust evidence that the area is significantly worse than the country as whole with regard to the negative impacts on biodiversity from development. The HBF does not disagree with the broad thrust that the UK has seen a significant loss in biodiversity not just in recent past but previous centuries and as such recognise the importance of ensuring that the outcome of new								

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											development in future is that there is a net gain in biodiversity. However, it is important to recognise that in recent years new residential development has not been the driver of declining biodiversity either locally or nationally and in particular over the last 50 years. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), as being “Intensive management of agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species’ population change in the UK”. Therefore, whilst it is important for development to ensure that it improves the natural								

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											environment, it is not the main driver of biodiversity decline in Essex or Castle Point. Given that the Government has stated that plan makers should not seek to apply a higher level of BNG it is clearly insufficient to simply state that a 20% BNG requirement is needed in CPDC without the evidence to show why new development is having a greater impact on biodiversity in Castle Point compared to other parts of the country. The Council is seeking to require new development to offset the impacts of biodiversity created by the practices of other industries. This is unsound and inconsistent with paragraph 58 of the NPPF and the tests as to when a planning obligation can be sought. Given that 10% net gain is								

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											considered by Government as to what is required to address the harm to biodiversity arising from that development there can be no justification for requiring a developer to go beyond that. 43. With regard to viability, the Council’s Viability Assessment (VA) states that it has based its cost on the Viability Assessment produced by Essex County Council and assumes the average cost of delivering 10% BNG to be £1000 per dwelling on green field sites and £450 per dwelling on PDL. These have been uplifted by £300 on green field sites to reflect the requirement to deliver 20% BNG. The Viability Assessment shows that on the basis of these costs green field sites can deliver 20% BNG. The difficult with assessments as to the cost of								

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											meeting BNG is that every site is different and until the baseline level of biodiversity is known the cost of meeting either 10% or 20% is not known. Therefore, if it is considered to be sound to place this bur-den on developers there must be scope for this to be reduced where it is a barrier to delivery. HBF therefore suggests that this policy or SP4 on developer contributions is amended to state that where a development is made unviable by the cost of meeting the 20% BNG requirement, on its own or in combination with other costs, this will be reduced to the statutory minimum.								

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1 0 2 0- 0 0 0 7	Organisatio n	Mar k	Beh rend t	Home Build ers Feder ation	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		Yes	Not Ans wer ed	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	Noted	N

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											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 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						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 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		

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											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						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 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		

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											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 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						homes to be net zero but where there is a mix of development the site as a whole to achieve the required standard.		

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											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								

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											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 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								

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											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								

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											not as an energy use target in order to avoid fragmentation of the standards with different requirements being set in 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.								

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											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								

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											costs 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								

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											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 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								

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											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								

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											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 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									

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											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								

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											policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for 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.								

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1 0 2 0- 0 0 8	Organisatio n	Mar k	Beh ren dt	Home Build ers Feder ation	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 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. Without evidence		Yes	Not Ans wer ed	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 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	Noted	N

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											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.						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. 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.		

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1 0 2 0- 0 0 0 9	Organisatio n	Mar k	Beh rend t	Home Build ers Feder ation	Yes	SD9	No		No	Justified, Consistent with national policy	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. Secondly, the policy states in part 4 that “All new development should demonstrate that adequate foul		Yes	Not Ans wer ed	Yes	A	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	Noted	N

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											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, every five years a Water Resources Management Plan (WRMP) to ensure just this. This is set out in sections 37A to 37D of the						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. 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		

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											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. 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-							”. 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, 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		

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											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 amount of water customers require. 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						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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											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.” 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								

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											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 pass on to applicants to resolve. 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.”										

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1 1 4 7- 0 0 0 1	Individual	Patr icia	Belc her			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 4 7- 0 0 0 2	Individual	Patr icia	Belc her			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 1 4 7- 0 0 0 3	Individual	Patr icia	Belc her			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 0 6 8- 0 0 0 1	Individual	Mau ra	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 especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications.	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	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 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.		
0 6 9 1- 0 0 0 1	Individual	Shar on	Bell		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 1 3- 0	Individual	Ant hon y	Bell		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0399-0001	Individual	Jacqueline	Benbrook		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0020-0001	Individual	Lili-Marie	Benmore		Yes	C4	No	Policy C4 – West Canvey 1. Legal Compliance I do not consider the Castle Point Plan to be legally compliant for the following reasons: * Accessibility of Consultation: The consultation has not been accessible to all residents. Many people in Canvey Island do not have reliable internet access, cannot easily travel to the library, or struggle to navigate the lengthy and complex online documents. This has effectively excluded a large portion of the community from meaningful participation. This is contrary to the Council’s Statement of Community Involvement (SCI), the 2012 Local Planning Regulations, and the requirements of the Equality Act 2010. * Failure to Appropriately Advertise the Appeals/Consultation Process: Information on how citizens could respond or appeal was not appropriately advertised. Many residents were unaware of the process or how to submit comments. The reliance on online forms excluded those without internet access, while the single alternative —	No	Positive,Effective,Justified,Consistent	2. Soundness I also do not consider the plan to be sound, as required under the NPPF, for the following reasons: a) Not Positively Prepared * The Plan ignores the severe flood risk facing Canvey Island. Concentrating growth here does not positively address local needs in a safe or sustainable manner. b) Not Justified * There is no evidence that West Canvey is the most appropriate location for such a large-scale allocation. * Other, less constrained sites exist within Castle Point that would be more suitable and safer for development. *	To make the Plan legally compliant and sound, the following modifications must be made: 1. Consultation & Accessibility * Every household on Canvey Island must receive a direct letter explaining the consultation/appeals process, with both online and paper response options (freepost return included). * Consultation materials must be available in accessible formats (large print, easy-read) and distributed at multiple venues across Canvey (community centres, GP surgeries, schools, council offices), not just one library. * Drop-in events should be held locally so residents can ask questions face to face. 2. Transport & Evacuation * A new road connection off Canvey Island must be committed to within the Plan, to relieve congestion and provide a safe evacuation route in the event of a flood or industrial accident. * Development should be conditional on this road being completed before large-scale housing or industrial expansion takes place. 3. Healthcare &	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	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	N	

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								accessing a paper version in the library — was unrealistic for residents with mobility issues, disabilities, caring responsibilities, or lack of transport. This approach does not meet the requirement for early, meaningful, and inclusive community engagement. * Habitats Regulations Assessment: Given West Canvey’s proximity to the Thames Estuary Special Protection Area (SPA) and Ramsar site, it is unclear whether the Habitats Regulations Assessment has properly assessed the full impacts of this scale of development. Failure to do so would render the Plan unlawful. * Flood Risk Compliance: The National Planning Policy Framework (NPPF) requires the application of the Sequential Test and Exception Test for flood risk. As Canvey Island is one of the most at-risk locations in the UK, the allocation of 500–1000 new homes here raises serious doubts that these tests have been correctly applied. The principle of sustainable development is not met, as the environmental and social harms clearly outweigh the claimed economic benefits. 3. Required Modifications 4. Conclusion For the reasons above, I request that Policy C4 – West Canvey be deleted from the Castle Point Plan unless the modifications set out are adopted.			The required flood risk Sequential Test does not appear to have been applied properly. c) Not Effective * Transport: The island has only two access routes, already heavily congested. Adding more housing and industry will worsen congestion and compromise emergency evacuation. * Infrastructure: No clear commitments exist for expanded healthcare, schools, emergency services, or utilities to support the additional population. * Parking: The proposed strategy to consolidate parking is unrealistic and will increase pressure on already congested residential areas. * Industrial/Commercial Expansion: Proposals to increase industrial and commercial floor space by 10% lack clear	Education * New housing must be supported by additional GP surgeries/doctors and at least one new primary school (with land safeguarded for a secondary school if needed). * Housing delivery must be phased alongside infrastructure provision, not left until afterwards. 4. Flood Risk Strategy * The Plan must include an updated flood risk strategy with upgraded defences, sustainable drainage, and an evacuation plan for residents. * The Sequential Test and Exception Test must be clearly evidenced and applied. 5. Parking & Local Services * Car parking standards must reflect the limited public transport available on the island. * Developer contributions (Section 106 or CIL) must be ring-fenced for services on Canvey Island (healthcare, schools, roads) rather than allocated elsewhere in the borough. 6. Biodiversity Protection * Strengthen protections for the Thames Estuary SPA/Ramsar site with buffer zones, green infrastructure, and mitigation measures. For the reasons above, I request that Policy C4 – West Canvey be deleted from the Castle Point Plan unless the modifications set out are adopted. Without them, the Plan is not legally compliant and not sound.					supply, leaving Green Belt sites vulnerable to speculative development. - Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. - Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. - Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. - Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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											evidence of demand and risk worsening air pollution, noise, and HGV traffic. d) Not Consistent with National Policy * The plan conflicts with NPPF flood risk policies (paras 159–169), which require directing development away from high-risk areas. * It also conflicts with NPPF biodiversity policies (paras 180–182), given the proximity to protected habitats. *								

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0 2 6 1- 0 0 0 1	Individual	Daw n	Ben nett		Not Stated	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey for two years but it is quite obvious that is unable to sustain any additional building with the current infrastructure. Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially 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	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	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stat ed	Not Stat ed	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	• 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 –	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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								Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating 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-			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								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.		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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								advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a 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			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								

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								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 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			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								

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								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.			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								

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											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								

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											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								

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											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								

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											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-								

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											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								

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											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,								

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											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								

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											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								

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											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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											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								

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											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									

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											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								

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											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								

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											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								

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											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.								
0 2 6 1- 0 0 0 2	Individual	Daw n	Ben nett		Not Stated	For wor d	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				Not Stat ed	Not Stat ed	No	A	• Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.									and housing distribution.		
0 2 6 2- 0 0 0 1	Individual	Joh n	Ben nett		Not Stated	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey for two years but it is quite obvious that is unable to sustain any additional building with the current infrastructure. Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey	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	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stat ed	Not Stat ed	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.	• 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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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								Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council’s decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without 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			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							Mitigation measure identiofied but theoretiscal rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understandin g of Canvey’s unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA.	and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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								residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including 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			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										Comments noted.	

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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 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			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								

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								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.			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								

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											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								

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											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								

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											development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of								

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											Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable								

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											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								

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											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								

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											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								

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											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									

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											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								

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											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								

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											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									

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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, 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								

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											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								

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											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								

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											not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission								

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											to the Planning Inspectorate.								
0 2 6 2- 0 0 0 2	Individual	Joh n	Ben nett		Not Stated	For wor d	No	A key statutory requirement is the ‘Duty to Cooperate’. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point’s case, the absence of clear and binding agreements on cross-	No				Not Stat ed	Not Stat ed	No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0 5 6 8 - 0 0 1	Individual	Bar bara	Ben nett		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for							5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further	

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											a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							information please see housing topic paper. Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable	

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																		option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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																		value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not	

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																		automatically mean that it is an appropriate development site for those reasons set out above. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements.	

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

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0 5 6 8 - 0 0 0 2	Individual	Bar bara	Ben nett		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 6 8 - 0 0 0 3	Individual	Bar bara	Ben nett		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
0 6 6 9- 0 0 0 1	Individual	Paul	Bennett		Yes	SP3	No	If you build these Properties, were are the vechiles going to get on and off the Island, It takes 1 hour to get from central Canvey to Waterside, or will the Council insited New Buyers only use Bikes. I feel this plan has been rushed to answer central Goverment. If a New a new Road was built not going via Water Side it may be a different Story, But Essex Council have ignored the Canvey Peoples request, How long can this go on?	No	Consistent with national policy	There's only one way off via Waterside Roundabout	A New Road of the Island, not via Waterside	No	Not Answered	Not Answered	A	Third road onto Canvey	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter	N

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

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																		Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0 9 1 0- 0 0 0 1	Individual	Nic ola	Ben son		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 9 1 1- 0 0 0 1	Individual	Ada m	Ben son		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0 4 4- 0 0 0 1	Individual	Cat heri ne	Ben son		Yes	TC2	No	Firstly, your proposal highlights the site's proximity to local necessities such as schools and colleges. However, it completely overlooks the critical issue of oversubscription at our local school. Residents living within the current catchment area often struggle to secure places, and the school itself has not, to my knowledge, been consulted regarding its capacity to support a greater intake of pupils from your development. This oversight suggests a lack of understanding of the existing strain on our educational infrastructure.	No	Positively prepared, Effective, Justified	Firstly, your proposal highlights the site's proximity to local necessities such as schools and colleges. However, it completely overlooks the critical issue of oversubscription at our local school. Residents living within the current catchment area often struggle to secure places, and the school itself has not, to my knowledge, been consulted	The TC2 site is not compliant. See above notes	No	Not Ans wer ed	Not Ans were d	A	Objects to policy TC2 because: Concerned regarding school places Require more two-three bedroom homes Eroding the village character by building more No consideration for green space and environmental impact	Castle Point has worked closely with the education authority (ECC) to ensure that there are enough school places provided The Council undertook a Local Housing Needs Assessment in December 2023 to ensure that the plan reflects the local housing needs of the Borough. Policies such as	N

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								Secondly, the planning document states that you intend to build 3-4 bedroom homes, citing high demand. While these may indeed be profitable, it is evident that this choice prioritizes financial gain over genuine community need. The reality in Thundersley is that council waiting lists for young families seeking smaller, more affordable homes are years long. Two and three-bedroom homes are desperately needed to address the housing crisis for our local families, not just larger properties catering to a wealthier demographic. We need homes for the community, not merely for profit. Furthermore, your document includes a token gesture towards green spaces, yet completely disregards the fact that yet more valuable land is being taken away. Thundersley is a village in name, but this relentless building is systematically eroding its character, making it increasingly congested and unattractive. There appears to be no genuine consideration for the environmental impact or the preservation of our green spaces in this proposal. Finally, your mention of local services is equally concerning. Despite living in the heart of Thundersley, I, along with many others, struggle to access a local dentist or			regarding its capacity to support a greater intake of pupils from your development. This oversight suggests a lack of understanding of the existing strain on our educational infrastructure. Secondly, the planning document states that you intend to build 3-4 bedroom homes, citing high demand. While these may indeed be profitable, it is evident that this choice prioritizes financial gain over genuine community need. The reality in Thundersley is that council waiting lists for young families seeking smaller, more affordable homes are years long. Two and three-bedroom homes are desperately needed to address the housing crisis for our local families, not just larger properties catering to a wealthier demographic. We							Infrastructure concerns	THUN5 has been implemented it does not result in the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements. The environmental impacts of development have been greatly considered in the formation of the plans, Chapter 18 Protecting our Biodiversity and Landscape is included within the plan to safeguard the environment and green spaces. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure	

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required		
								doctor. This development will undoubtedly place further unbearable pressure on already overstretched services, making it even harder for existing and new residents to access essential healthcare. I urge you to seriously reconsider your current plans and engage in genuine consultation with the Thundersley community to develop a proposal that truly addresses our needs rather than exacerbating existing problems.			need homes for the community, not merely for profit. Furthermore, your document includes a token gesture towards green spaces, yet completely disregards the fact that yet more valuable land is being taken away. Thundersley is a village in name, but this relentless building is systematically eroding its character, making it increasingly congested and unattractive. There appears to be no genuine consideration for the environmental impact or the preservation of our green spaces in this proposal. Finally, your mention of local services is equally concerning. Despite living in the heart of Thundersley, I, along with many others, struggle to access a local dentist or doctor. This development									Delivery Plan (IDP).	

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											will undoubtedly place further unbearable pressure on already overstretched services, making it even harder for existing and new residents to access essential healthcare. I urge you to seriously reconsider your current plans and engage in genuine consultation with the Thundersley community to develop a proposal that truly addresses our needs rather than exacerbating existing problems.								
1 3 2 3- 0 0 0 1	Individual	Chri stin e	Bent ham			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 3 2 3- 0 0 0 2	Individual	Chri stin e	Bent ham			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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																		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.	

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																		North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of	

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																		the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us	

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																		would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to	

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																		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.	
1 3 2 3- 0 0 0 3	Individual	Chri stin e	Bent ham			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 1 1 7- 0 0 0 1 1	Individual	Sara h	Bent ley		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		No		Housing target for Castle Point not met. The site selection ignores Greenbelt /	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the	Y - Policy SD3(3) 3. Proposal s must demonstr ate how

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								Thundersley. It has no credible five-year housing land supply.			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.						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	supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SuDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																	residents in the East at risk with emergency evacuation procedures.		
0 1 1 7- 0 0 0 2	Individual	Sara h	Bent ley		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 6 7 1- 0 0 0 1	Individual	Mel anie	Berr y		Yes	HA D4	No	Cannot see sustainability appraisal and habitat regs assessment	No	Positively prepared	Hard to assess soundness without seeing the proposed building plan. Discrepancy over number of dwellings - is it 80 as stated here or 114 as an alternative version shows? If 114 is the correct figure then I cannot see how this is possible in the space. If 80 dwellings is correct then I assume that this includes flats, which would be out-of-keeping with the rest of Scrub Lane and inappropriate next to infant/nursery school and school playing fields. We need to see the planned	Require details of the planned development, impact on local infrastructure and how negative impact will be mitigated. What is actual number of dwellings permitted and how will this be achieved whilst complying with national policies.	No	Not Ans wer ed	Not Ans were d	A	Questioning HAD4 allocation number 80 or 114 Request to see plans Objecting to HAD4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	Allocation numbers Policy Had4 allocates atleast 114 homes. Plans Request Plans have not been submitted to the Council on this site but please be advised that should the Council receive an application for this site plans will be available to view on the Councils website. Traffic Capacity Any application for homes on this site will have to comply with policy T6	N

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											development to ensure it fits with the local environment. 80 dwellings means 80-160+ car parking spaces - are these in the plans? Most family homes now have at least 2 cars/vans - more now that young adults are living in parental home for longer. What is being done to expand other services - eg Hollies surgery which struggles already with capacity. What parking will be provided for Hadleigh Infants as parents currently use Scrub Lane - will this parking be kept? How will increased traffic at junction of Scrub Lane/Rectory Road/New Road be dealt with - already overloaded during rush hours and used as 'rat run' when problems on A13/A127. Currently this land is a wasted space so I agree that it is a prime space for							which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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											building but it needs to be a sensible amount of dwellings to fit in with the area and 80/114 (whichever is correct figure) both seem outlandish. Residents need to see more detailed plans before we are able to agree whether sound or legally compliant.								
0 6 7 2- 0 0 0 1	Individual	STE VE	BER RY		Yes	HA D4	Yes	I've put 'yes' because I am assuming the team who have produced this draft are professional enough and better qualified than myself to know what 'legal compliance' means in relation to providing this document	No	Positively prepared, Effective, Justified	Loading another 80 homes (yes the draft shown in the link above is the incorrect 2023 one I am led to believe!!) let alone 114 as the new 2026 draft apparently shows plus a car space for each dwelling suggests this proposed development would have to be multi-storey or even include a large number of HMOs, because the plot size is not large enough for 80 (or 114) dwellings. This would not be in keeping with the style of the existing properties along Scrub Lane. If there are more	Less homes on this plot. Consideration given to traffic problems that will arise from loading so many dwellings alongside an already busy road. I haven't got time to reword the Had4 except to change the number of dwellings to 20. The dwellings should have gardens and off-road parking spaces just like the existing properties in Scrub Lane.	No	Not Ans wer ed	Not Ans were d	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Location of site close to a school and play park	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking	N

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											cars than dwellings then it is likely that Scrub Lane will develop into an obstructive car-park for most hours of the day. Already at school drop-off and pick-up times there is a large bottle-neck alongside this plot. Whilst on the subject of traffic, this road is already jam-packed during the rush-hours and is used as a rat-run whenever traffic is impacted along the A13 and A127 routes. Regular gridlocks occur which would be well-known to those who live in the area, which I very much doubt anyone proposing Had4 currently does. So, from the effective aspect of 'soundness' (what a ridiculous way of assessing the impact on residents, by the way!) it depends whose viewpoint you are looking from. From my own this 'effectively' messes up my ability to drive about the area and												Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Location The council has a duty to provide homes for all and supported living dwellings are considered appropriate in this location. More information can be found in the Equality Impact Assessment.	

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											'effectively' proposes far greater traffic problems at some point in the future. Is it 'justified'? Again, a planning officer will have his target to achieve with pressure from above to squeeze as many dwellings into as small a space as possible. From my perspective, as a resident, I understand homes will be built on this plot but I believe it is totally unjustifiable to suggest this many properties in such a small space. It would not be comparable to the existing volume of dwellings anywhere in Scrub Lane. Indeed, as an example of how The Planning Team messed things up in the past by allowing too many homes to be built without sufficient parking see Scrub Lane Mews for information then try driving past it unhindered at any time of the day! 80 (or 114!?)								

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											dwelling with a car each (at least)....you really are not being serious, surely! Another reason it cannot be justified is that the local doctors surgery, The Hollies, in Rectory Road is already overrun with patients and securing a quick appointment is already very difficult. Positively prepared? Well, it's not a positive from my perspective, in any way shape or form. Positive would be helping the community with this space....a few houses, a new doctor's surgery, a pub, a play area for kids after they come out of school...no, you as Planners have a mandate from the government to swamp us all with houses wherever they can be squeezed on to the Castle Point map, sadly. What is wrong here is that there are not enough Planners who make these								

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											decisions living here to care what happens to our community. Consistent with National Policy? Well, the Government wants homes to house the burgeoning population so that box would be ticked by this policy. But does it not have a policy of safeguarding children so I would need to know what the 6 dwellings housing individuals with 'complex needs' could involve in this respect. With the proposed development overlooking an infant school playground hopefully there will be due consideration given to who is housed in such a sensitive area.								

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0 9 0 0- 0 0 0 1	Individual	STE VE	BER RY		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	First of all, can I just say that 3b is not the sort of question you ask local residents, many of them elderly and not very computer-literate. Those who have compiled the local plan are not personally invested in the suggested development of this plot so they may consider the proposal and the overall plan as positively prepared, effective, justified and consistent with national planning policy. We, as residents, are looking at this from the perspective of how it impacts our everyday lives....and it is hugely personal to all of us. This proposed development does not take into account the existing neighbourhood's needs which are falling short in so many ways and have been for some time. The doctor's surgery in	Not for us to do. There is consideration of the existing neighbours, the impact on the current infrastructure, the knock-on effect of significant traffic jams, etc etc. The only change I wish to insist upon is the removal of the number 114 and its replacement by the number 14.	No	Not Answered	Not Answered	A	Objecting to HAD4 because: Traffic Parking Infrastructure Density	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan	N

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											Rectory Road is already understaffed and swamped with patients that it is difficult to get an appointment at short notice and non-urgent appointments can take weeks. The traffic issues in Scrub Lane are notoriously bad (partly down to school parking twice a day but also due to Scrub Lane Mews that was a poorly thought-out planning approval!) and whenever there is a problem on the A127 or A13 then Scrub Lane is always the rat-run that leads to local gridlock. 114 residences is a ridiculous number of dwellings to dump on this site. It is in no way consistent with the type of housing currently on Scrub Lane. Indeed, 14 houses is probably the sort of size of homes that this plot could accommodate. 114 dwellings would likely add a							(IDP). Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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											minimum of 114 cars exiting on to Scrub Lane. There are no multi-storey buildings currently in the vicinity and I cannot see any other way of providing 114 homes with 114 parking spaces on such a small plot. There does not yet seem to be any information about adding to the infrastructure with doctors surgery, additional school places etc and these, as mentioned above, are already over-run with applicants/patient s from the existing neighbourhood. In short, you are trying to compensate the inadequacy and failure of countless councils in order to appease Central Government demands for more housing. Our neighbourhood is already overrun with over-development and this is massive overkill on a small plot. I therefore wish to add my								

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											objections to the argument against this proposed development. It is not going to mirror the current housing that faces the plot opposite, it will cause a significant deterioration in traffic along Scrub Lane, particularly if parking spills onto Scrub Lane as is the case with the awful Scrub Lane Mews bottleneck. The schools will be overrun with demand for places more so than ever and so too the doctor's surgery, The Hollies. If there has to be development on this land then make it match the existing neighbourhood as your Planning Officers are instructed to ensure, but I challenge any architect to come up with such a design which includes 114 properties on this small plot and which complies with that regulation.								

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0 9 2 2- 0 0 0 1	Organisatio n	Mic hael	Bevi ngton	Electr osens itivity UK	Yes	INF RA6	Yes		No	Effective	§§ 19.71 and 19.73 recognise that the ICNIRP Guidelines exclude protection for people with implants. (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	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 Ans wer ed	Not Ans were d	A	§§ 19.71 and 19.73 recognise that the ICNIRP Guidelines exclude protection for people with implants. (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 radiofrequen cy radiation and EMFs. Long-term and non-thermal effects have been established since 1953 and include neurological and cardiovascula r harm, infertility and cancers. Therefore both EMFs and RF-EMF have been	Noted	N

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											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. (b) One established result of exposure to man-made EMFs and RF-EMFs is the condition 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						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,		

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											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. (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.						schools and hospitals. (b) One established result of exposure to man-made EMFs and RF-EMFs is the condition 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		

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																	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.		
0 9 2 2- 0 0 0 2	Organisatio n	Mic hael	Bevi ngto n	Electr osens itivity 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	§21.56. Add: Best practice should be followed in providing LED lighting suitable for people sensitive to LEDs.	No	Not Ans wer ed		A	Some people, including those with specific health conditions, are adversely affected by LED streetlights which have	Noted	N

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											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.						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.		
0 3 3 8- 0 0 0 1	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		For wor d	Yes	The ICB has been consulted at each stage of Plan preparation and between the formal stages the Council has engaged the ICB in ‘duty to cooperate’ meetings. The Council has explained its process, approach and Plan content, and has listened and responded to matters raised by the ICB. Adjustments have been made to policy and supporting text in response to the ICB’s comments at earlier stages of the Plan preparation process. The ICB is satisfied that, in relation to its duties to the ICB as a statutory consultee in the plan making process, the Council has complied with the relevant regulations.	Yes		The test of “soundness” has 4 strands, the last being that the Plan must be consistent with national policy, enabling the delivery of sustainable development in accordance with the policies in the NPPF. The ICB’s comments on the “soundness” test are directed at this requirement, specifically in relation to health and wellbeing. Many of the					A	The ICB has been consulted at each stage of Plan preparation and between the formal stages the Council has engaged the ICB in ‘duty to cooperate’ meetings. The Council has explained its process, approach and Plan content, and has listened and responded to	Support noted	N

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											policies in the Plan will have direct or indirect impacts on the health and wellbeing of the current and future population of Castle Point as well as the delivery of healthcare services. These are important elements of sustainability. The ICB's response to consultation on the Castle Point Plan Issues and Options document in September 2024 set out the ICB's priorities and outlined the Mid and South Essex Joint Forward Plan 2024-2029 before answering the specific consultation questions. Within these answers the ICB made a series of requests for amendments and comments on the Plan. The Council published its Issues and Options Consultation Statement 2025 which summarises the ICB's comments, explains that the						matters raised by the ICB. Adjustments have been made to policy and supporting text in response to the ICB's comments at earlier stages of the Plan preparation process. The ICB is satisfied that, in relation to its duties to the ICB as a statutory consultee in the plan making process, the Council has complied with the relevant regulations.		

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											ICB;’s comments have been considered and how matters have been addressed. 1The 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:								
0 3 3 8- 0 0 0 2	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		Visi on	Yes		Yes			The ICB requested that within the vision, reference to health be strengthened by saying that health inequalities will be reduced reflecting the ICS’ common endeavour. The Plan vision has not been amended saying that health inequalities will be reduced, and its omission has not been explained. The ICB request that this amendment is made.				A	The ICB requested that within the vision, reference to health be strengthened by saying that health inequalities will be reduced reflecting the ICS’ common endeavour. The Plan vision has not been amended saying that	The opening sentence of the Vision recognises the fundamental importance of health, stating: ‘All residents have the opportunity to fulfil their potential and live happy, healthy, productive lives.’ It is also noted that Plan objective 19	N

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																	health inequalities will be reduced, and its omission has not been explained. The ICB request that this amendment is made. refers to the goal of ‘reducing health equalities’, as follows: ‘Objective 19: Secure improved health and wellbeing outcomes for residents enabling more active and healthier lifestyles, creating healthy Living environments and reducing health inequalities.’ Therefore, ICBs common endeavour is reflected in the Plan objectives.		

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0 3 3 8- 0 0 0 3	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		Infr a3		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 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: • 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 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							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 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	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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								open spaces and making roads safer for walking and cycling.									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 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: • Secure developer contributions towards new healthcare space with the NHS determining how new provision should be provided. • Work with partners in		

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																	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 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,		

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																	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 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		

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																	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.		
0 3 3 8- 0 0 0 4	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		Infr a5		Policy Infra5 – Indoor Leisure and Sports recognizes 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 Council will seek to secure new and improved indoor leisure and sports facilities.								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	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	N

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																	Issues and Options Consultation Statement 2025 explains that: • Policy Infra5 – Indoor Leisure and Sports recognises that access to opportunities for sport and 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. • Secure developer contributions towards new healthcare space with the NHS determining how new provision should be	to inform policies and to improve performance in these areas as appropriate.	

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																	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 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,		

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																	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 island. Similar policies are proposed for other places in the district. The ICB supports the inclusion of these policies		

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																	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.		
0 3 3 8- 0 0 0 5	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		Can vey Isla nd	Yes	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 island. Similar policies are proposed for other places in the district.	Yes		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.					A	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	Support noted	N

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																	as appropriate.		
0 3 3 8- 0 0 0 6	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		Hou 4	Yes	The ICB requested consideration be given to requiring more than 8% of new homes to be built to the M4(3) standard to allow some choice for residents in need of wheelchair user housing. The Council's Issues and Options Consultation Statement 2025 explains that all new homes will be delivered in accordance with accessibility standards as follows: 10% of all new homes will be built to standard M4(3) wheelchair user.	Yes		Policy Hou4 – Specialist Housing Requirements states that all new homes will be delivered in accordance with accessibility standards as follows: a. 100% of all new homes will be built to standard M4(2); b. 10% of all new homes will be built to standard M4(3). The supporting text explains that in order to provide both choice and resilience in the housing stock and recognising that some need will also be met through adaptations, the Plan/s requirements that 10% of all new dwellings meet M4(3) standard remains justified and deliverable. The ICB's request is addressed.					A	Policy Hou4 – Specialist Housing Requirement s states that all new homes will be delivered in accordance with accessibility standards as follows: a. 100% of all new homes will be built to standard M4(2); b. 10% of all new homes will be built to standard M4(3). The supporting text explains that in order to provide both choice and resilience in the housing stock and recognising that some need will also be met through adaptations, the Plan/s requirements that 10% of all new dwellings meet M4(3)	Support noted	N

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																	standard remains justified and deliverable. The ICB's request is addressed.		
0 3 3 8- 0 0 0 7	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		TC5	Yes	The ICB asked for a proactive approach to managing the number and location of hot food takeaways. Policy TC5 – Hot Food Takeaways and Fast Food Outlets states that new hot food takeaways or fast food outlets will only be permitted in town centres, local shopping parades or in our of centre retail parks, and only where specified conditions are met. These include the location being more than 400m from the nearest school entrances, a health impact assessment shas been undertaken with measures identified to limit the impact on the proposal on obesity levels in the local community.	Yes		The inclusion of Policy TC5 provides a tool to control the number and location of new hot food takeaways and fast food outlets and satisfies the ICB's request.					A	The inclusion of Policy TC5 provides a tool to control the number and location of new hot food takeaways and fast food outlets and satisfies the ICB's request.	Support noted	N
0 3 3 8- 0 0 0 8	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		D1- D9 Ach ievi ng Wel l Des igne d Pla ces	Yes	The ICB requested that parity of access to homes, spaces and means of transport for residents in all parts of the district should be addressed through the borough-wide design code. The supporting text to the Achieving Well Designed Places chapter, explains that the Castle Point deign Code has informed how policies in this chapter will be implemented. Policy D1 – Design Objectives sets out design criteria for new developments Policy D2 – Design on Larger Sites and within Premium Sustainability areas sets higher	Yes		The focus of policies is, understandably, on new developments. In relation to Canvey, place-based policies are included in the Plan; some allocate land for Mid and South Essex Integrated Care Board development including delivering enhancement to					A	The focus of policies is, understandably, on new developments. In relation to Canvey, place-based policies are included in the Plan; some allocate land for Mid and South Essex Integrated Care Board	Support noted	N

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								design requirements for specified areas Policy D3 – Master Planning sets out the requirements for master planning of sites allocated for development. Policy T1 – Transport Strategy includes commitments to securing developments in accessible locations with good access to services and integrated transport, including walking and cycling infrastructure and public transport; requiring new developments to be designed using active design principles; securing improvements to provide well connected walking and cycling routes and associated infrastructure.			places, others seek to protect and improve existing assets. The ICB does not object to the proposed policies but asks whether the policies will be sufficient to deliver improvements for existing communities. The ICB asked that the design of new development should recognise and address the link between health outcomes and the wider determinants of health, including housing, transportation, access to healthy food options, social integration and the built environment. The ICB is satisfied that the Plan policies recognise the relevance of the wider determinants of health and should contribute to improving population health and wellbeing.						development including delivering enhancement to places, others seek to protect and improve existing assets. The ICB does not object to the proposed policies but asks whether the policies will be sufficient to deliver improvements for existing communities. The ICB asked that the design of new development should recognise and address the link between health outcomes and the wider determinants of health, including housing, transportation, access to healthy food options, social integration and the built environment.		

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																	The ICB is satisfied that the Plan policies recognise the relevance of the wider determinants of health and should contribute to improving population health and wellbeing.		
0 3 3 8- 0 0 0 9	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		Infr a4	Yes	The ICB advocated the protection of attractive and accessible open spaces including appropriate signage, toilet facilities and availability for community events.	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
0 3 3 8- 0 0 1 0	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		SP4	Yes	The ICB requested that healthcare infrastructure should be brought forward by new developments mitigating their impact recognising that the health system needs flexibility to spend contributions in the most appropriate way at the point that the development proceeds. In addition, planning policies and planning	Yes		Policy SP4 provides an adequate framework for negotiating development contributions. It should be noted that NHS Mid and South Essex will seek to secure					A	Policy SP4 provides an adequate framework for negotiating development contributions. It should be noted that NHS Mid and South Essex	Policy SP4 provides an adequate framework for negotiating development contributions. It should be noted that NHS Mid and South Essex will seek to	N

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								obligations should be drafted to allow flexibility to respond to changing population health priorities and models of care.			investment through central capital funding, local resources and contributions through local authorities to invest in infrastructure that not only provides the primary care needs of growing and increasingly elderly populations but also for peoples' wider health and care needs to be met through "left shift of care" into a community setting.						will seek to secure investment through central capital funding, local resources and contributions through local authorities to invest in infrastructure that not only provides the primary care needs of growing and increasingly elderly populations but also for peoples' wider health and care needs to be met through "left shift of care" into a community setting.	secure investment through central capital funding, local resources and contributions through local authorities to invest in infrastructure that not only provides the primary care needs of growing and increasingly elderly populations but also for peoples' wider health and care needs to be met through "left shift of care" into a community setting.	
0 3 3 8- 0 0 1 1	Organisatio n	Cat heri ne	Bick nell	NHS Mid and South Essex		T1/T 3	Yes	The ICB requested that active travel and public transport are promoted in the local plan and that walking, as the most accessible type of active travel, is prioritised. The ICB is satisfied that Plan policies, including T1 and T3, require that active travel and public transport are prioritised and make provision for their improvement.	Yes		The Pre-submission Local Plan addresses the issues raised by the ICB, with the exception of including reference to reduced health inequalities in the Plan Vision. The ICB requests that this amendment is made but is					A	The ICB requested that active travel and public transport are promoted in the local plan and that walking, as the most accessible type of active travel, is	Support noted	N

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											satisfied that the Plan is sound in its approach to delivering sustainable communities from a health and wellbeing perspective.						prioritised. The ICB is satisfied that Plan policies, including T1 and T3, require that active travel and public transport are prioritised and make provision for their improvement.		
0 5 7 8 - 0 0 0 1	Individual	Joan	Billings		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures	5YHLS 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	N

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											of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents						Need for a third road to be included in the plan.	from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the	

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											who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							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. Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4)	

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																		outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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																		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.	

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

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

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																		relevant transport improvement projects identified in the Local Transport Plan.	
0 5 7 8 - 0 0 0 2	Individual	Joan	Billi ngs		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however	N

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											provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.						for local residents	included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes.	

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																		Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 7 8 - 0 0 0 3	Individual	Joan	Billings		Yes	For eword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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											on this matter has been published and the meetings were poorly adve1iised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.								

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0 5 8 1 - 0 0 0 1	Individual	Ray mon d	Billi ngs		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 8 1 - 0 0 0 2	Individual	Ray mond	Billi ngs		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 8 1 - 0 0 0 3	Individual	Ray mond	Billi ngs		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
0 6 5 3- 0 0 0 1	Individual	Georgia	Billington		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. 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
0624-0001	Individual	Mary	Bimson		Yes	SP3	No	It's not treating us equally like the rest of Castlepoint	No	Justified	We have no room for 3000 houses, we flood with a small amount of rain, traffic is unbearable and dangerous in rush hour, the answer is not to suggest more buses and put cycle lanes in, there is more room in the rest of Castlepoint example manor trading estate in benfleet.	More houses put in the rest of Castlepoint and less in Canvey who can't support them.	No	Not Answered		A	Flood Risk on Canvey Bad traffic on Canvey Put Houses on Manor Trading Estates	Flood Risk Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	N

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																		Traffic on Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the	

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																		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. Manor Trading Estate Policy B8 allocates Manor Trading Estate as part of the Castle Point Plan.	
0 6 2 4- 0 0 0 2	Individual	Mar y	Bim son		Yes	T1	No	We deserve to be safe on our roads, by putting 3000 houses here that could equate to 6000+ more cars that's a fatality coming...we have one road all going to Sadlers and the island can't cope now, putting more buses and cycle tracks in us not an answer, the rest of Castlepoint can have their cars but on canvey they want us to give up driving !	No	Justified	We do not have room or road structure to handle this.	Look at our road structure and come to Canvey at rush hour!	No	Not Ans wer ed		A	Road Infrastructure on Canvey	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access	N

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																		Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0 6 2 4- 0 0 0 3	Individual	Mar y	Bim son		Yes	SP3	No	Plan states our bad the traffic is and their only answer is to find ways to get us out of our cars!! No !	No	Justified	It's got no justification, anyone can see Canvey cannot take this amount of building but the rest of Castlepoint can !!	Build elsewhere in castlepoint where there is more room and infastructure	Yes	Not Ans wer ed		A	Don't build on Canvey, build in the rest of the Borough instead.	All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	N
0 6 2 4- 0 0 0 4	Individual	Mar y	Bim son		Yes	SP3	No	Canvey will become a carpark and lose all of its charm, there will b3 nowhere to breath	No	Justified	Canvey is being used as a dumping ground to save the rest of Castlepoint	Put the houses in the places of Castlepoint where they can take it, people who wrote the plan do not care about canvey they luv3 in the rest of Castlepoint.	No	Not Ans wer ed		A	Don't build on Canvey, build in the rest of the Borough instead.	All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	N
0 6 2 4- 0 0 0 5	Individual	Mar y	Bim son		Yes	E1	No	We will be an area that's just residential, no shops no employers, people will have to leave the island to find employment, but they won't be able to get off the island because of the huge amount of traffic trying to leave the island	No	Justified	We won't have room for any businesses so no employment	We need employers, for that we can't just be residential	No	Not Ans wer ed		A	Need buisness premesis not just residential	The Plan is not just residential, it ensures that there is sufficient employment land and commercial floorspace to support the needs of the local economy. Policies E1-E4 cover	N

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																		"Supporting Employment and Tourism".	
0 3 6 9 - 0 0 0 1	Individual	Sus ann e	Bins kin		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.	N

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											ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and							The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is	

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											the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year	

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																		on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between	

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																		CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not	

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																		limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our	

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																		Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
1 4 1 8- 0 0 0 1	Individual	Lorr aine	Bird		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N

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0 3 6 8 - 0 0 0 1	Individual	Cliff ord	Bish op		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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											support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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																		again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North	

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																		West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the	

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																		natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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																		site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0 8 5 9- 0 0 0 1	Individual	Deb bie	Bish op- lagg ett		Yes	HA D4	No	114 houses is far to many for a small area. Schools and doctor's surgeries would not have capacity for extra residents. Scrub Lane would become congested with extra houses, residents. Bus route would cause massive congestion and rendering already broken speed humps (put there to make roads safer for children) unusable.	No	Effective, Justified	Would overpopulate a small area with not enough infrastructure to cope with even more residents. Any bus routes going through scub lane would cause huge traffic congestion for existing residents to be able to reach their own	A maximum of 64 houses at most and for bus routes to remain on the london road as has always been the case. Bus routes in scrub lane would be extremely detrimental	Yes	Not Ans wer ed	Not Ans were d		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5	N

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											properties. With an elderly contingent of residents in the area it would make it difficult for ambulances to reach people in a timely manner							to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	
0 0 7 7- 0 0 0 1	Individual	Geo ff	Blac kled ge		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation. I consider the plan achieves a good balance for future sustainable growth and that the draft plan is both legally compliant and sound.	Yes				Not Stat ed		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0 0 7 8- 0 0 0 1	Organisatio n	Geo ff	Blac kled ge	The Castl e Point Wildli fe Group	Yes	Wh ole Pla n	Yes	The Castle Point Wildlife Group Registered Charity Number 1139395 support the Castle Point Plan Regulation 19 Draft Consultation. The Group works to protect and increase the biodiversity in the remaining green spaces in Castle Point for	Yes		It seems to the Group that the Draft Plan allows a balanced growth for jobs, housing, infrastructure etc while retaining important green		Not Stat ed		No	A	The Castle Point Wildlife Group Registered Charity Number 1139395 support the	Support noted.	N

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								the benefit of wildlife. This in turn provides clean air and safe, open spaces for the benefit of residents health and recreation.			spaces. The Group considers the draft plan to be legally compliant and the Group considers the draft plan to be sound.						Castle Point Plan Regulation 19 Draft Consultation. The Group works to protect and increase the biodiversity in the remaining green spaces in Castle Point for the benefit of wildlife. This in turn provides clean air and safe, open spaces for the benefit of residents health and recreation. It seems to the Group that the Draft Plan allows a balanced growth for jobs, housing, infrastructure etc while retaining important green spaces. The Group considers the draft plan to be legally compliant and the Group considers the		

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																	draft plan to be sound.		
0 8 4 1- 0 0 0 1	Individual	Davi d	Blac kwe ll		Yes	Wh ole Pla n	Yes		Yes	Positively prepared			No	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant	Support noted.	N

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0 0 4 1- 0 0 0 1	Individual	Car olyn	Blak e		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a 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	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	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stat ed		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								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 response regarding the draft plan are: * Castle Point faces 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												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	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	

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								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). 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			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									understandin g 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 comprehensi ve drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on	been considered through the Surface Water Modelling Technical Note of the SFRA.	

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								critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			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								inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing		

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											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						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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											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								

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											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								

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											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								

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											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-								

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											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									

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											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,								

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											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								

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											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								

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											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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											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								

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											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									

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											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								

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											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								

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											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								

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											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.								
0041-0002	Individual	Carolyn	Blake		Yes	For word	No	A key statutory requirement is the ‘Duty to Cooperate’. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	• Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.									and housing distribution.		
0 0 4 2- 0 0 0 1	Individual	Davi d	Blak e		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green	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	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stat ed		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	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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								Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the 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,			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								Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. . Welcome the Council’s commitment to requiring	infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water Modelling Technical Note of the SFRA.	and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers 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			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								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,		

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								Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by 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			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								including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities.		

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								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.			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						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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											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								

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											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								

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											development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of								

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											Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable								

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											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								

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											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								

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											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								

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											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									

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											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								

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											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								

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											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									

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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, 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								

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											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								

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											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								

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											not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission								

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											to the Planning Inspectorate.								
0 0 4 2- 0 0 0 2	Individual	Davi d	Blak e		Yes	For wor d	No	A key statutory requirement is the ‘Duty to Cooperate’. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point’s case, the absence of clear and binding agreements on cross-	No	Not Stated			Not Stat ed		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0 0 4 3- 0 0 0 1	Individual	Kier a	Blak e		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected	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	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stat ed		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	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	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

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								wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation 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			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						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	form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water Modelling Technical Note of the SFRA.	Risk Assessment (SFRA).

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								format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory 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			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									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		

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								several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these 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			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							Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield		

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								development is sustainable, justified, and in the public interest.			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						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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											designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West								

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											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								

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											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								

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											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								

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											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								

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											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								

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											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								

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											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								

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											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									

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											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								

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											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								

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											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									

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											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								

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											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								

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											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.								
0 0 4 3-	Individual	Kier a	Blak e		Yes	For wor d	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring	No				Not Stat ed		No	A	• Duty to Cooperate - Absence of clear and	Duty to Cooperate: Addressed in the Duty to	N

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0 0 0 2								sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.									binding agreements on cross-boundary infrastructure and housing distribution.	Cooperate Statement and supporting Statements of Common Ground.	

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0 6 6 0- 0 0 1	Individual	caro lyn	blak e		Yes	SP3	No	The proposed housing development, to the west of Canvey, is planned on land that serves as a critical habitat for endangered species, including great crested newts and rare wildflowers. Construction on this site risks the destruction of irreplaceable biodiversity and the permanent loss of protected habitats.	No	Positively prepared, Effective, Justified	The plan is unsound because it proposes concentrating the majority of new housing on Canvey Island, which is already subject to severe infrastructure constraints. The island has only two road exits, creating significant congestion and posing safety concerns in emergencies. The area lies below sea level and the existing drainage system is already under strain; further development would increase the risk of flooding, particularly as no sustainable drainage improvements have been outlined. Local services — including schools, GP surgeries, and dental practices — are at or beyond capacity, and there are no credible plans in place to expand these essential facilities to meet the increased demand from	The current draft is unsound because it is not positively prepared, not justified, and not effective, contrary to the tests of soundness in paragraph 35 of the National Planning Policy Framework (NPPF). Transport and Accessibility (NPPF para 108–110) The majority of proposed new housing is allocated to Canvey Island, which has only two road exits. This creates a high risk of severe congestion and hinders emergency evacuation, contrary to NPPF requirements for developments to provide safe and suitable access for all users. No robust transport strategy or infrastructure investment plan has been provided to address these constraints. Flood Risk and Drainage (NPPF para 159–165) Canvey Island is below sea level and already experiences drainage capacity issues. The existing system is unable to cope with increased surface water from recent developments. The draft plan does not demonstrate that the sequential and exception tests for flood risk have been satisfied, nor that sustainable drainage measures will be implemented before development proceeds. Community Infrastructure (NPPF para 20, 34, and 93)	No	Not Ans wer ed	Not Ans were d	A	Lack of infrastructure on Canvey Infrastructure provision before dwellings are built Third road onto Canvey is needed Wildlife should be protected, especially around Canvey Wick Flood risk on Canvey	Lack of infrastructure provision Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Infrastructure delivered before homes are The Castle Point Plan is accompanied by an Infrastructure Delivery Plan. This identifies all the infrastructure needed to support the proposed growth. Infrastructure will be delivered at different times depending on when it is most appropriate to provide it. For example, access improvements may be delivered during the early phase	N

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											additional housing. Regarding the rare local wildlife and fauna: Notable Endangered Invertebrates Some of the nationally important and rare species found in Canvey Wick include: • Canvey Island Ground Beetle (<i>Scybalicus oblongiusculus</i>) — previously thought extinct in Britain and rediscovered here • Shrill Carder Bee (<i>Bombus sylvarum</i>) — one of the UK's rarest bumblebees, surviving in only a few fragmented pockets, including Canvey Wick & surrounding areas • Brown-banded Carder Bee (<i>Bombus humilis</i>) • Five-banded Weevil-wasp (<i>Cerceris quinquefasciata</i>) • Scarce Emerald Damselfly (<i>Lestes dryas</i>) Rich Plant and Fauna Diversity • Surveys have revealed a wealth	Local schools, GP surgeries, and dental practices are already at or beyond capacity. No deliverable plan or funding mechanism is provided for expanding these facilities to meet the demands of the proposed growth, contrary to NPPF requirements that local plans should plan positively for the provision of community facilities and services. Proposed Modifications: Rebalance Housing Distribution Amend allocations to reduce the proportion of housing on Canvey Island and redistribute to areas with better transport links, lower flood risk, and existing infrastructure capacity. Transport Infrastructure Commitment Include a binding commitment that no major housing developments on Canvey Island will proceed until a third vehicular access route is operational and congestion mitigation measures are in place. Flood and Drainage Safeguards Require that all new developments on Canvey Island incorporate Sustainable Drainage Systems (SuDS) and demonstrate no net increase in flood risk, with works completed						of a development. A school meanwhile may not be opened until there is enough children to make the revenue costs of running the school sustainable. Sometimes, financial contributions from two or more developments may be needed to provide a particular piece of infrastructure. This may mean the infrastructure is delivered when the last site is coming forward for development. Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access	

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											of wildflowers and orchids, including 1,700 common spotted orchids (Dactylorhiza fuchsii), 500 pyramidal orchids (Anacamptis pyramidalis), and 25 bee orchids (Ophrys apifera) - The site also supports diverse birdlife, including green woodpecker, stonechat, reed warbler, and west yellow wagtail, as well as growing numbers of nightingales Brownfield Comeback: An Accidental Nature Reserve - Originally an intended oil refinery site that was never fully developed, Canvey Wick & surrounding area, abandoned infrastructure and varied soil composition created a mosaic of habitats—ideal for rare invertebrates - Its varied terrain—ranging from grassland and scrub to bare concrete and	prior to first occupation. Infrastructure Delivery Plan Revision Update the Infrastructure Delivery Plan to include specific, costed, and funded proposals for additional school places, GP capacity, and dental provision before occupation of new dwellings.						improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point	

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											wetland—supports exceptional biodiversity per square metre Additionally the area also has adders: Legal status • Protected under the Wildlife and Countryside Act 1981 (Schedule 5) in the UK. • It’s illegal to intentionally kill, injure, or sell them. • Their habitat isn’t fully protected, but disturbing them deliberately is an offence.							Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Flood Risk Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood	

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																		management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey	
0 1 6 1- 0 0 0 1	Individual	Nor ma	Bla mey		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy.It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF	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 Stat ed		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	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. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site

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											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.						predetermine d 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.	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.	circumst ances, landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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0161-0002	Individual	Norma	Blamey		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures, because although there are 2 roads to enter/exit the Island, they both meet at the same roundabout (Waterside Farm) and regularly gridlock at busy times or in the event of another activity away from the Island.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0190-0001	Individual	Margaret	Blamey		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased 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 sites". Not all sites have been considered. 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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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											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.						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.	through the SFRA.	and the Castle Point Strategic Flood Risk Assessment (SFRA).
0 1 9 0- 0 0 0 2	Individual	Margaret	Blamey		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 1 4 4- 0 0 0 1	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	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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt /	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the	Y - Policy SD3(3) 3. Proposals must demonstrate how

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
								Thundersley. It has no credible five-year housing land supply.			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.						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	supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SuDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																	residents in the East at risk with emergency evacuation procedures.		
0 1 4 4- 0 0 0 2	Individual	Sam anth a	Ble wer		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 9 4 6- 0 0 0 1	Individual	WIL LIA M	Bliss ett	RESID ENT	Yes	SP3	No	Failing to adequately consider alternative sites across the Borough including North West Thundersley /Blinking Owl site. There is no credible 5year housing land supply. Failure in 'Duty to cooperate' with other Authorities including Essex County Council and Anglian Water.	No	Positively prepared, Effective, Justified, Consistent with national policy	The draft Local plan is not consistent with National Policy. It does not meet the housing targets for Castle Point. Development should be directed away from areas of highest flood risk. Canvey Island has the highest flood risk rating in the Borough and yet has been allocated the largest number of houses of all the Borough areas. The surface and foul water drainage systems on Canvey Island have reached capacity and will not cope with so many additional homes . By building so many new homes the natural drainage on the Island is significantly reduced. The Castle Point draft Plan will be detrimental to the Health and Wellbeing of Island residents. The road network on the Island is at	The North West Thundersley / Blinking Owl site should be included in the plan. This is an ideal site for the development of a whole new village with all of the required infrastructure. The Urban Housing target for Canvey Island and the Borough should be reduced with consideration given to development on greybelt and appropriate greenbelt sites. Potential dwellings on Charfleets Industrial Estate should be removed.	No	Not Ans wer ed	Not Ans were d	A	North West Thundersley No five year housing land supply No Duty to cooperate Not meeting housing targets Flood Risk on Canvey Green/Grey belt Concerned about the impact of C4 on residents and businesses.	North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. No five year housing land supply The Council is currently relying on the 1998 Adopted Local Plan which does	N

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											capacity and would not cope with so many additional vehicles. Proper consultation with the businesses on Charfleets has not taken place. The type of businesses do not lend themselves to having flats above them. Such a large scale redevelopment of the Estate is not practical and would drive many businesses into bankruptcy These businesses would not be able to afford future higher rents.. Many of the businesses own their sites so in some instances compulsory purchase would be necessary.							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	

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																		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. Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting	

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																		Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. 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	

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																		appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood	

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																		Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After	

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																		a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the	

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																		number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. C4 concerns on residents and buisnesses This states at paragraph 8.36 There are a mix of uses within the industrial estate including offices, gyms, nurseries, car sales and also heavier industry	

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																		such as steel manufacturing. It is therefore important that the Master Plan for the area sets out a land use strategy that encourages renewal and regeneration but avoids issues of residential amenity and addresses the agent of change principle for noisy businesses already in the area. This will ensure that residential amenity is safeguarded. In terms of businesses the policy proposed does not seek to cause any harm to existing economic activity and seeks to provide a better environment for existing businesses.	
1 3 9 2- 0 0	Individual	Brid get	Blos s		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N

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0 1																			
1 3 9 3- 0 0 0 1	Individual	Ron ald	Blos s		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N
0 6 5 1- 0 0 0 1	Individual	Am elie	Bole yn		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 6 9 8- 0 0 0 1	Individual	Rich ard	Bon ham		Yes	SP3	Yes		No		To many people on Canvey island , Thorney bay and kings have too many mobile homes		No	Not Ans wer ed	Not Ans were d	A	Castle point Plan is not sound.	Comments noted.	N
0 7 5 3- 0 0 0 1	Individual	Rich ard	Bon ham		Yes	Wh ole Pla n	No	Poor road , unable to cope with existing traffic	No				Yes	Not Ans wer ed	Not Ans were d	A	Traffic	The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council,	N

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																		have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.	
0 6 3 4- 0 0 0 1	Individual	Me gan	Boni well		Yes	SP3	No		No	Positively prepared	On behalf of myself and most residents of Canvey Island we are extremely worried about new development plans over population the Island	A serious think onto what benefits the island	No	Not Ans wer ed	Not Ans were d	B	Over population of the Island	Comments noted.	N
0 6 3 4- 0 0 0 2	Individual	Me gan	Boni well		Yes	For ew ord	No		No		Given the feedback and OBJECTIONS to the soundness of the plan from the Essex County Council, Basildon Council, Rochford District Council (includes Brentwood Borough Council),		No	Not Ans wer ed	Not Ans were d	Non e	The Plan has been rushed and not thought through, this is reflected in surrounding councils objection comments	Comment noted. This Plan has been worked on since 2022 and is supported by an extensive evidence base. Objection comments submitted by neighbouring	N

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											Canvey Island Town Council and now Southend City Council I believe what you are trying to achieve has been rushed, not thoroughly though through and will impact Canvey Island massively. Mismanagement from the highest order without thinking about the local residents and the risk factors involved.							councils have been addressed where necessary.	
0 6 5 7- 0 0 0 1	Individual	Rich ard	Boo th		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 3 6 - 0 0 0 1	Individual	Crai g	Borg		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 3 7 - 0 0 0 1	Individual	Kell y	Borg		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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1 4 4 3- 0 0 0 1	Individual	Phili p	Bost ock		Not Stated	SP3	Not Stat ed	To suggest building 757 homes on every available car park and space in Hadleigh is plainly daft. No point saying that it's not been agreed. Even putting it forward is not sensible. If you are driven by dark forces or mental disturbance you need to get a grip, push back, act rationally.				There is open land east of Hadleigh, south of the A13. It's a poor place to put houses as it just adds to the congestion of the area. But it's still better than your 'plan'. But it's green belt. A million times better than the 'grey belt' car parks. Please try harder.					There is open land east of Hadleigh, south of the A13. It's a poor place to put houses as it just adds to the congestion of the area. But it's still better than your 'plan'. But it's green belt. A million times better than the 'grey belt' car parks.	Noted	N
0 2 2 3- 0 0 0 1	Individual	Bria n	Both am		Not Stated	SP3	Yes	Hello, My name is Brian Botham, I am a Town Councillor but I am writing as a private individual. I write with regard to the proposed local plan. Is it legally compliant? again I would have thought that council has carried out due diligence and that the plan conforms to government guidelines. But is the plan right for Canvey Island? The answer to that is a resounding NO! You cannot honestly expect to build another 3300 homes on an already overpopulated island. Our infrastructure will not cope with the increased traffic, our local services; doctors, dentists and schools etc will not be able to meet demand. There is also the ever present flood risk. Many areas in west Canvey where the majority of building is planned, is on marsh land or areas of conservation. Also I do not believe that the views and	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		Not Stat ed	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have	

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								concerns of the local people have 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.			their mandate to stop the overdevelopment of Canvey Island, by pushing this plan through, you are going against your electoral promise to the people who put you in power. This plan will not work for Canvey and will undoubtedly bring problems beyond belief if it 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	policies 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.	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 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.		
0 2 2 3- 0 0 0 2	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
0 4 8 8 - 0 0 0 1	Individual	Gillian	Boucher		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is	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.					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. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines.	<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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-

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											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 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	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. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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	blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	infrastructure .	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		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.	
0 4 8 8 - 0 0 0 2	Individual	Gilli an	Bou cher eau		Yes	C4					The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergancy evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 4 6 8 - 0 0 0 1	Individual	Phili p	Bou rnes		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	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	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. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set					Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management	N

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											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. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for	measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.					Engage with friends of Canvey Lake	plan, it will ensure that the maintenance of the lake is upkeep and will detail who is responsible for this.	

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											Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing								

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											concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water.quality threatens users, animals and biodiversity. However, without concrete delivery-mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake								

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											continue to increase.								
0 4 6 8 - 0 0 0 2	Individual	Phili p	Bou rnes		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the						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. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermine d towards a	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											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.						"no greenbelt build policy". Site selectiction 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 .	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. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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	

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																		Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0 4 6 8 - 0 0 0 3	Individual	Phili p	Bou rnes		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 4 1 0 - 0 0 0 1	Individual	Mar gare t	Bow den		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as 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	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				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. Site selection ignores Greenbelt/	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastruc ture and Sustaina ble Design

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											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.						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 selectiction 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	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. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons	

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																	unique geography and drainage infrastructure .	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting	

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
																		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.	
0410-0002	Individual	Margaret	Bowden		Yes	C4	No				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 number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0 3 3 9- 0 0 0 1	Organisatio n	Sara h	Bow erm an	Essex and Suffol k Water		SP3	Not Stat ed	The housing requirement set out in Policy SP3 is stepped, with 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) 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 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 possible.	Not Sta ted		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 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					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 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-	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-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.	N

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											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.						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 the planning authority. It is important to reiterate that Essex & Suffolk Water considers all applications across our entire operating area carefully,		

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																	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.		
0339-0	Organisation	Sarah	Bowerman	Essex and Suffolk Water		HO U5	Not Stated	We note that the replacement of old caravans at Thorney Bay Caravan Park does not need planning consent but does contribute to housing supply.	Not Stated		It is not clear whether they are obliged to conform to policy SD9, and so we would ask					A	We note that the replacement of old	Park homes are generally exempt from UK Building	N

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0 0 2								Over the Plan period it is expected that a total of 173 park homes will replace existing caravans at this site.			the council to ensure all new caravans, including those on all sites in the Borough, meet water efficiency standards set out in Policy SD9.						caravans at Thorney Bay Caravan Park does not need planning consent but does contribute to housing supply. Over the Plan period it is expected that a total of 173 park homes will replace existing caravans at this site. It is not clear whether they are obliged to conform to policy SD9, and so we would ask the council to ensure all new caravans, including those on all sites in the Borough, meet water efficiency standards set out in	Regulations (including Part G water efficiency standards) because they are considered a type of mobile, transportable dwelling. Instead of the Building Regulations, new park homes intended for permanent residential use must comply with the British Standard BS 3632 which promotes water efficiency through requirements for specific types of plumbing systems and water-using appliances, it does not use the same quantifiable l/p/d target or the same regulatory framework as Part G of	

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																	Policy SD9	the Building Regulations. The Council will encourage compliance with relevant water efficiency standards as far as possible.	
033-0003	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 standards 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, 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	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					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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								standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. The Shared Standards recommend that LPAs include Local Plan Policies that: • Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible. • Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. • Require new major non-domestic developments to include water saving measures and water reuse in their design. These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated 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			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									

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								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.			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.								
0 3 3 9- 0 0 0 4	Organisatio n	Sara h	Bow erm an	Essex and Suffol k Water		D3	Yes	We are fully committed to supporting economic growth across the region and in the Borough of Castle Point and continue to invest in infrastructure enhancements to improve water distribution. However, it is important to note that, unlike domestic supplies, we do not have the same statutory obligation to provide water for non-domestic purposes and may be unable to immediately do so if the new water requirement is greater than the residual capacity in our network. We therefore have a particular interest in proposed strategic employment and economic development within your administrative area so that we can plan timely investment to increase capacity should it be needed. Policy B8 Manor Trading Estate and Policy C4 West Canvey explain that the regeneration	Yes		We note that both sites are intended to come forward later in the Plan period, and it is imperative to work collaboratively regarding the anticipated timing and phasing of the development and for us to fully understand the nature of the development. Again, we strongly encourage the submission of pre-planning enquiries to Essex and Suffolk Water (ESW) so we can ascertain the water supply needs, and plan and deliver in a timely manner any					A	We are fully committed to supporting economic growth across the region and in the Borough of Castle Point and continue to invest in infrastructure enhancements to improve water distribution. However, it is important to note that, unlike domestic supplies, we do not have the same statutory obligation to provide water	Throughout the Castle Point Plan, the need to collaborate with a range of stakeholders to ensure delivery of development is highlighted. Paragraph 16.38 identifies that through the master plan process, infrastructure providers will be engaged, however it is agreed this could be clarified further through Policy D3. Policy D3 - Master Planning	Y - additional reference to infrastructure prviders, as set out in the Schedule of Modds,

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								and renewal of their respective areas will be carried out through a master plan approach. Policy E1 Development on Strategic Development Land states that the council will seek to provide and maintain classes B2 and B8 and another suitable Class B uses. We are keen to work collaboratively with the Local Authority’s Economic Development and Planning teams to gain a detailed understanding of the nature of the proposed development. The development is expected to fall broadly within Use Classes B2, B8, and other Class B categories which can encompass a wide range of commercial activities with significantly varying water supply requirements. We are currently updating our policy position on large non-household developments requiring significant mains water for non-domestic use including but not limited to data centres, giga factories and hydrogen production plants. However, we can confirm that we will not approve new mains water connections to data centres where the water will be used for open loop cooling systems as we consider this to be an unsustainable use of water. However, we will consider supplies for closed loop cooling systems on a case-by-case basis through our pre-planning enquiry process.			necessary infrastructure that may be needed. We also understand that, in the early stages of the Plan period, industrial use displaced by the redevelopment of sites for residential or town center purposes may be relocated to designated employment areas. Considering this, we request to be consulted at the earliest opportunity so that we can assess any associated infrastructure requirements in a timely manner.							for non-domestic purposes and may be unable to immediately do so if the new water requirement is greater than the residual capacity in our network. We therefore have a particular interest in proposed strategic employment and economic development within your administrative area so that we can plan timely investment to increase capacity should it be needed (Policies B8 and E1) We are keen to work collaboratively with the Local Authority’s Economic Development and Planning	1. Where this Plan requires the use of Master Plans for allocated sites, these will be approved by the Council in advance of the determination of any planning application. Where sites are in multiple ownership this will ensure that any individual parcels will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the site allocation or wider area. 2. In preparing the Master Plan, the Council requires the applicant to demonstrate how they have engaged with and sought the views of relevant landowner(s), key stakeholders, infrastructure providers and the local community.	

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																	teams to gain a detailed understanding of the nature of the proposed development. The development is expected to fall broadly within Use Classes B2, B8, and other Class B categories which can encompass a wide range of commercial activities with significantly varying water supply requirements . We are currently updating our policy position on large non-household developments requiring significant mains water for non-domestic use including but not limited to data centres, giga factories and hydrogen production plants.	Whilst Councils can encourage pre-application discussions, it is an optional, discretionary service and cannot be made a requirement.	

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																	However, we can confirm that we will not approve new mains water connections to data centres where the water will be used for open loop cooling systems as we consider this to be an unsustainable use of water. However, we will consider supplies for closed loop cooling systems on a case-by-case basis through our pre-planning enquiry process. We note that both sites are intended to come forward later in the Plan period, and it is imperative to work collaboratively regarding the anticipated		

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																	designated employment areas. Considering this, we request to be consulted at the earliest opportunity so that we can assess any associated infrastructure requirements in a timely manner.		
0 8 3 0- 0 0 0 1	Individual	Kier on	Bow ker		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 6 2- 0 0 0 1	Individual	vivi enn e	bow yer		Yes	SP3	No		No	Positively prepared	Anglian Water is already having difficulty in providing water and sewage, these plans in addition to the extra use of water required for the new rubbish plans will tip these resources over the top. Are all depts consulted ? Are you providing a helicopter pad to get people to hospitals if the need arises ? The roads are already congested all these		No	Not Ans wer ed	Not Ans were d		Has the water companies been consulted? Emergency services access Traffic	Water companies consulted? Yes we have consulted Essex and Suffolk Water and Anglian Water and have statements of common ground agreed. Emergency services Needs of emergency services considered in the supporting	N

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

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																		Local Transport Plan 4.	
0 2 4 1- 0 0 0 1	Individual	Don ald	Boyl e		Not Stated	Wh ole Pla n	Yes	We support the plan	Yes				Not Stat ed		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0 2 4 2- 0 0 0 1	Individual	Sus an	Boyl e		Not Stated	Wh ole Pla n	Yes	We support the plan	Yes				Not Stat ed		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N

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0 2 1 9- 0 0 0 1	Individual	Gra ham	Brac ci		Yes	SP3	Yes	1.01 Canvey Island is the most Densely Populated and Deprived part of Castle Point. Despite its social challenges and constrained infrastructure, it hosts 2 Top Tier COMAH sites, in very close proximity to the Residential neighbourhoods. These sites pose risks of catastrophic incidents due to mechanical failure, human error, or external threats. Increasing residential density near such installations elevates the potential consequences of a major incident. The COMAH regulations and associated Hazard Ranges are designed to limit exposure—not expand it. The juxtaposition of high-density housing with high-risk industrial infrastructure is antithetical to sustainable land-use planning. 1.02 Canvey Island is at, or just below Sea Level apart from a small area known as Canvey Heights. It is designated a Flood Zone 3A area. Whilst it has Sea Defences, it remains at Residual and Actual Risk of Tidal Flooding, a substantial planning issue. With the rising sea level, due to climate change, the protection afforded by these existing defences is decreasing, and is likely to fall below current target levels within the lifetime of any new developments. 1.03 Indicative flood defence raising requirements are as follows: • About 0.3m in 2040	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		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 within flood zones and	Noted	N

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								(to a level of 6.7m AOD) • A further 1.4m in 2070 (to a level of 8.1m AOD) These increases depend on the rate of sea level rise. 1 1.04 These aspirational new raised sea defences may actually harm the sustainability of Canvey Island as a desirable location to live. “Whilst hard defences could potentially be raised within existing footprints, the structures would be tall, unattractive and restrict public access.” 2 1.05 Castle Point Borough Council, within Planning Matters suggest, as a general approach that “the continued development of Canvey Island is necessary to sustain the local community and prevent the social and economic blight of the settlement”. 3 1.06 However, this claim overlooks the NPPF requirement to avoid new housing in highconsequence flood zones unless there are no reasonably available lower-risk sites. Being such a small Borough, it is difficult to suggest that there are no more suitable sites in the near vicinity in lower Flood Risk Zones. 1.07 To claim that housing development improves “sustainability” in this context ignores the fundamental principle of avoiding development in high-consequence flood zones, as			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 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									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		

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								emphasised in the NPPF and Strategic Flood Risk Assessments. 1.08 True sustainability involves balancing environmental constraints, social well-being, and economic viability. Adding residential housing in a location with constrained evacuation routes, ageing infrastructure, and limited resilience planning, does not meet this balance. This does not comply with the NPPF’s Sequential Approach to Strategic Development Site Selection. 1.09 We are mindful of Castle Point Borough Council own officers advice to Councillors; “Given the risk to the population, various measures are required to deal with the concerns to human health and wellbeing. These include: • The need for an emergency plan to be in place; • The need for sea defences to be maintained and improved; • The need to maintain the population living in the flood risk zone at current levels or lower;” (My emphasis) 4 1.10 Also, Advice to CPBC, contained in the current Strategic Flood Risk Assessment Level1 “Recommendation 4-2 CPBC should pursue opportunities to move existing development from within the floodplain to areas with a lower risk of flooding.” (My emphasis) 1.11 To propose a Mixed Use			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								

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								Development at West Canvey will necessitate the use of Green Land, an area which, alongside other green areas, fulfilled an essential flood prevention purpose for nearby land during the Canvey Island 2014 Summer Flooding. Plus it will increase the Population at Risk of Flooding and a Hazardous Industry incident. 1.12 Essex County Council produced a 41 page Flood Investigation Report, into the “Canvey Island 2014 Summer Flood.” 5 This document was highly informative of the devastation caused and the shortcomings and failures of the various infrastructure and agencies, during the event. 1.13 Following this the “Canvey Island 6-Point Plan” 6 was produced to attempt to raise Government assistance in Funding. “The cost of a future flooding incident on the Island would be in the region of £274m per year in lost economic output, and up to £2.1bn in damage to residential property.” “Unless a strategic and wide reaching flood mitigation programme can be implemented, site based flood mitigation could be seen by developers as too expensive and fragmented.”” In order to deliver this vital plan, all relevant agencies and central government need to work together and address the			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								

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								£24.5m funding shortfall.” 1.14 The approach to Government found that a detailed account of funding expenditure was required to proceed to consideration, and we are led to believe that is where the effort was left. 1.15 Initially, following the 2013 and 2014 Canvey Flooding, work was undertaken on the mapping of the Canvey Integrated Urban Drainage System, Drainage repairs, and Road drainage infrastructure maintenance undertaken. Unfortunately the regularity of these services receive inadequate finances, and rather than the promised more regular maintenance, they now receive less. 1.16 We are now informed that the Urban Greening Scenario Testing on Canvey Island would not produce a significant impact on Flood Risk. 7 1.17 We are also mindful of the Examining Inspector’s Letter of Advice to Castle Point Council, during the very first attempt to produce a CPBC Plan; “I have reservations about the methodology employed and the way in which it appears to have been used, leading to inconsistent and inappropriate site selection. For example, the Council’s own Sustainability Appraisal is unclear as to why the most sustainable Green			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 is contrary to NPPF guidance and Planning Practise								

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								Belt site was discounted. I therefore consider the Council needs to revisit its assessment of Green Belt locations paying particular regard to the five purposes of the Green Belt as set out in PPG2. I accept that other considerations will also influence the choice of sites but potential locations should not be dismissed because local factors are given too much weight. This appears to have happened previously. The Council’s desire to protect its Green Belt areas is understandable but its approach has also had a considerable bearing on the overall distribution of growth promoted in the Core Strategy. In this respect, I consider it would be difficult to endorse a strategy which commits to Green Belt release in an area of potential high flood risk at Canvey Island yet fails to identify more than a token amount of land on the mainland where flooding is not a significant issue. While I accept some development at Canvey Island may be required to meet local needs and to support services, I am not convinced that maintaining the current distribution of development across the Borough is justified given the existing constraints.” 8 1.18 Rather than developing more housing at a rate that will			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									

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								inevitably increase the numbers of population of Canvey Island at Risk of Flooding and / or a Hazardous Industrial Incident, caution should be applied and Development should be planned-for in a limited fashion by means of Regeneration. Thus providing work for the local Building Industry. 1.19 In these circumstances there is no place for the “Local Factors” previously recognised by Planning Inspector Mr P.Crysell, see above, to remain an influence on the skewed Housing Development Distribution contained within this latest version of the CPBC Plan. 1.20 Whilst this approach may be considered radical, we consider it essential that the Population level of Canvey Island be maintained at the same level, or lower, and that the Constraints indicated within the NPPF are justly applied for the benefits of the Health, Safety and Well-being of all Canvey Islanders. The Regeneration of Brownfield land should be the approach to enable Sustainable Development for Canvey Island.			this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection								

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0 2 1 9- 0 0 0 2	Individual	Gra ham	Brac ci		Yes	SD1	Yes	CPBC Plan Page 170 6.01 In the further interest of public safety, there needs to be a realisation that Canvey Island is at risk of being inundated by the sea. Subsequently there needs to be a “Flood Risk Consequence Analysis” undertaken that evaluates the consequences, on the population living and working at or below sea level, following a major breach, or over-topping of its Sea Defences. 6.02 Policy SD1 rightly identifies Canvey Island as being at high risk of tidal flooding and sets out principles to avoid development in Flood Zone 3. However, Policy C4 proposes considerable development in West Canvey, which lies within this zone. This contradiction undermines the credibility of the Plan and raises concerns about the safety and sustainability of future development 6.03 Castle Point Borough Council continues to wrongly report / imply that the funding for Canvey Island’s Sea defence improvements has been secured. The Environment Agency via, its TE2100 plan, aspires to 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	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		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

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								that such improvements are subjected to funding and costeffectiveness. Without such improvements Canvey Island may become unsustainable as a settlement. 6.04 There has been extensive works undertaken via Strategic Flood Risk Assessments giving timescale, velocity and depths of sea inundation at several locations across Canvey Island. However, such works have failed to provide any indication as to the type and number of the population that would be engulfed within these inundation events. 6.05 With this in mind, we remain concerned by the methodology employed by Castle Point Borough Council in their application of the Sequential Test regarding development on Canvey Island. The Urban development only policy, effectively removes extensive option for sequentially testing alternative sites at other areas of the borough. 6.06 Given the extremely problematic logistical access and egress issues when planning for a breach of defended locations on Canvey Island, 14 it is imperative that where it may be intended to increase the numbers at risk or consequences of inundation, that site			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 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										Assessm ent (SFRA) and recomm endation s/advice from statutory bodies (includin g EA, Essex LLFA).'

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								selection is informed by the findings of a "Major Breach of Sea Defence Consequence Analysis" 6.07 The overlapping of survey maps, imaging the landscape of the borough likely to be encompassed by such potential incidents, will provide a reasonable indication of the likely make up and numbers of the population and the severity of injuries 15 In doing so assisting CPBC with the undertaking of the duties placed upon them via the Civil Contingency Act. 6.08 Regarding Canvey Island’s Green Belt and Green Field spaces, we consider these areas valuable and essential assets when considering Flood Risk, whether from Tidal or Surface Water sources. Their ability to provide Space for Water, and in the event of a Tidal Breach to			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								

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											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								

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0 2 1 9- 0 0 0 3	Individual	Gra ham	Brac ci		Yes	C4	Yes	3.01 The land to the south of Northwick Road has extant consent for employment development but this has been in place for many years due to a technical commencement but has not yet occurred. It appears that CPBC are confident that Housing development may be more forthcoming. This could be seen as being overly optimistic. A Housing development in close proximity to the proposed mixed industrial use development may offer little appeal, or confidence, to a potential new community of flat dwellers / home owners. 3.02 West Canvey is subject to the issues of potential Flood Risk, also the issues emanating from the Hazardous Industries which could potentially affect the rest of Canvey Island and its residents. 3.03 Being close to the sea defence the ground conditions may likely be affected by the high water table, which in itself may be influenced by saline water, indicating tidal water traversing beneath the sea defence could be a constraint on the construction of a Flatted development. Raising Ground Levels above the threat of Flooding may well impact upon nearby land and property. 3.04 Some of the existing commercial users in the Charfleets area are themselves involved in heavy industrial activities,	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		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	Underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. The Plan does not seek to meet	Canvey Transport and Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	N

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								creating an undesirable area for a Housing development 3.05 The current new retail / commercial area, despite being popular amongst locals is extremely poorly served by public transport. It relies on a high majority of private car users. 3.06 Without significant infrastructure upgrades, environmental mitigation, and a shift in the surrounding land uses, the site risks becoming an isolated, high-cost enclave rather than a thriving community. 3.07 A phased or mixed-use Masterplan that buffers residential areas from heavy industry, integrates green space, and improves transport could make the scheme more viable, however, that would require substantial investment and coordination			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 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							development needs in a sustainable or safe manner. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan’s ability to meet urgent housing needs. The Plan is not deliverable without significant risk to public safety and infrastructure capacity Without significant infrastructure upgrades, environmental mitigation, and a shift in the surrounding land uses, the site risks becoming an isolated, high-cost enclave rather than a thriving community.		

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0 2 1 9- 0 0 0 4	Individual	Gra ham	Brac ci		Yes	C3	Yes	CPBC Plan Pages 38 – 39 2.01 Insufficient Controls on Activities: There is no clear framework for monitoring or regulating port operations. Policies SD6 (Pollution Control), SD1 (Flood Risk), and SD8 (Hazardous Uses) should be explicitly referenced and integrated into Policy C3 to ensure proper oversight. 2.02 The Port Facility at Canvey Island specifically only facilitates the unloading for storage, forwarding on and bunkering of huge quantities of hazardous materials, these being LPG, oil and fuel-based products, serving the Upper Tier Establishments (upper tier, being a recognition of specified quantities of certain dangerous substances processed or stored, having the potential to cause significant on-site and off-site consequence to employees, the wider members of the public, including the possibility of causing multiple fatalities) of Calor Gas and Oikos. 2.03 The Plan fails to reference or take into account the proposed Oikos Marine & South Side Development (Case Ref: TR030004), a live Nationally Significant Infrastructure Project (NSIP) currently in the pre-application phase. 9 Should this application be	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		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	Highlights risks at hazardous sites Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space	Hazardous installations and port-related activities As set out in Plan paragraph 8.28 ‘Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development. Both installations have HSE consultation zones identified around them, in which it is expected that other development is controlled to limit	Policy Hou5 – Park Homes. 1. New park homes will only be supported on existing Park Home sites as defined on the Policies Map, and subject to compliance with other plan policies Justification: The existing wording may be misinterpreted that intensification of Park Homes is automatically acceptable in principle. Noting that park

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								accepted the resulting outcome would effectively double the storage capacity provided by this establishment. This omission undermines the Local Plan’s compliance with the tests of soundness when set against Policy C4 increased societal risk. Calor Gas and Oikos Major Hazards Storage and Distribution Site 2.04 The Castle Point Plan Policy SD8 fails to address the significance of the hazardous sites of Calor Gas and Oikos by not employing the current HSE methodology, despite CPBC being the designated Hazardous Substances Authority. These sites pose significant risks due to the nature of materials handled and their proximity to the existing and proposed increase of residential areas. The absence of a clear direction undermines CPBC’s statutory responsibilities and leaves a critical gap in strategic planning, emergency preparedness, and community safety. 2.05 The description of these being Hazardous Sites somewhat discredits their potential to do harm. These are in fact Major Hazardous Sites categorised as “UPPER TIER ESTABLISHMENTS” described as follows. Establishments			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 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										catchment areas for flood mitigation. The Plan is not based on proportionate evidence and fails to justify its spatial strategy. Furthermore, the Plan does not reflect legal duties under the Civil Contingencie s Act 2004 or COMAH Regulations to plan for foreseeable emergencies. The Plan does not integrate consequence -based planning for flood risk or hazardous installations.	unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new development is proposed’ The current HSE consultation zones are indicated on the policies map.	home sites exist within areas of serious constrain t such as the consultat ion zone for hazardou s installati ons (Policy SD8), FZ3, etc.

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								2.06 The term “Establishment” generally relates to the whole location under the control of an operator whose activities involve installations handling specified dangerous substances, present in specified quantities. Installation 2.07 The term “Installation” generally means a technical unit within an “Establishment” whether at or below ground level, in which dangerous substances are produced, used, handled or stored and includes all equipment, structures, pipelines, machinery, tools, private railways sidings, docks, unloading quays serving the installation, jetties, warehouse or similar structures, floating or otherwise necessary for the operation of that installation Domino Effect. 2.08 The proximity of the “Establishments of Oikos and Calor and their Installations,” could be the source of, or increase the risk or consequences, of a major accident and of domino effects. Off-Site Hazard Range Major Accident Consequence Analysis. 2.09 Many things can go wrong at major hazardous sites and despite the risk being maintained to, as low as reasonably practicable, residual risk remains. The serious consequences of unconfined			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										The plan doesn’t propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site. Policy SD8 ‘Development near Hazardous Uses’ states that ‘Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds’. Needs of	

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								vapour cloud explosions, flash fires, and BLEVEs are very well known. Undertaking “Off- Site Hazard Range Consequence Analysis” provides CPBC with a better understanding of impact distance consequence emanating from major accidents. 10 2.10 Given the above, it is imperative that CPBC’s Plan establishes meaningful Major Hazardous Site Local Policies that support objectives preventing major accidents and limiting the off-site consequences of such accidents for human health, safety and the environment. Such policies, informed by the information provided by Upper Tier Establishments Safety Reports, specifically to assist with incumbent Off-Site Emergency and Land-Use-Planning.			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 services considered in the supporting Infrastructure Delivery Plan (IDP). The Councils detailed emergency planning pages are here www.castlepoin t.gov.uk/emerge ncyplanning/	

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											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 is contrary to NPPF guidance and Planning Practise								

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											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								

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											this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection								

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											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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0 2 1 9- 0 0 0 5	Individual	Gra ham	Brac ci		Yes	GB1	Yes	CPBC Plan Page 126 5.01 We welcome and support the CPBC Plan's desire to protect the Borough's Green Belt. However we are most concerned at some of the findings contained in the Castle Point Green Belt Assessment. 5.02 The broader functions of the Canvey Island Green Belt, beyond the official Purposes, have received little importance and weight. It is apparent that the CPBC Plan indicates little enough weight given to assets included within areas GB1, GB2 and GB3. 5.03 We consider that the latest CPBC Green Belt Assessment is wrong to indicate that Parcels GB1 and GB2 in particular, should be identified as potential Grey Belt. Both Parcels meet the PPG criteria to remain as Green Belt. 5.04 Annex 2 of the NPPF defines Grey Belt Land, as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 of the NPPF. 5.05 Quite clearly GB1 and GB2, Very Strongly contribute to Purpose a) to check the unrestricted sprawl of large built-up areas; Canvey Island being the most densely populated area within Castle Point. 5.06 Besides this, GB1, GB2 and GB3 all contribute to Purpose e) to assist in urban	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		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 prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. Welcome and support the CPBC Plan's desire to protect the Borough's Green Belt. However we are most concerned at some of the findings contained in the Castle Point Green Belt Assessment. The broader functions of the Green Belt, beyond the official Purposes, have received little importance and weight	Green Belt/Grey belt covered under policy GB2. Non-Green Belt factors in relation to these sites are considered in the SLAA and SA. The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point,	N

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								regeneration, by encouraging the recycling of derelict and other urban land. As indicated by the CPBC Plan’s development proposals for Canvey Island. 5.07 Furthermore, these parcels fall within the protections of Footnote 7. Parcel GB1 containing the Dutch Cottage a Listed Building. Parcel GB2 directly abutting a now rare Roman Saltern, a Scheduled Monument, of which Historic England note that in Essex, only a very small number remain. 11 GB2 with a strong boundary at the Southern and Eastern edges marked by the Hill Hall Dyke, a designated Main River. 12 5.08 GB1, GB2 and GB3 all fall within Tidal Flood Zone 3. Within a particularly vulnerable Area, reliant on the Tidal Barriers giving sole protection from Flooding, due to there being a lack of sea wall defence alongside the Benfleet Station area, and the vulnerable clay banking sea defence alongside the RSPB land. 5.09 Development within any of these areas should constitute inappropriate development and amount to, reason enough to remain within the Green Belt Boundary and not to be considered Grey Belt. 5.10 We are concerned that these parcels have received a strategic re-branding, GB1, GB2			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 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								Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not	

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								and GB3. During previous CPBC attempts at Plan-making they have been numbered Area 23 and Area 26. It is reasonable to consider that there may well be a specific reason to draw these areas to prominence within the Borough’s Green Belt parcels, to which we can only conclude what the CPBC Core Strategy Examining Inspector Mr P.Crysell identified as“Local Factors,”remains active and relevant today. Building any housing in flood zone 3, without at least first looking at alternatives, sequentially outside of these high risk areas (in addition to the Comah sites) is indeed unreasonable, having already identified Canvey Island Brownfield spaces for Housing.			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								automatically mean that it is an appropriate development site for those reasons set out above. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	

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											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								

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											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 is contrary to NPPF guidance and Planning Practise								

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											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								

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											this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection								

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0 2 1 9- 0 0 0 6	Individual	Gra ham	Brac ci		Yes	C7	Yes	CPBC Plan Page 46 4.01 Extract from the 6-Point Plan for Canvey Island, concerning Canvey Lake. “The Section 19 Flood Investigation Report, published by Essex LLFA in September 2014, recommended a thorough investigation into the capacity available in the Canvey Lake. The lake, strategically located in the centre of the Island, forms part of the Island’s surface water drainage system and so ensuring it is kept in a good condition and able to receive surface water during storm events is vital.” 4.02 More Importantly; “In a further report by the government’s Chief Scientist, Sir Mark Walport, it was also mentioned that capacity of this lake needed to be addressed and maintained.” 4.03 “The MAP has completed the first phase of modeling the impacts of dredging the lake, to remove large amounts of silt which have built up over time. The group has also suggested re-profiling the banks of the lake, to provide additional storage capacity in high intensity rainfall events. This increased storage capacity could allow surface water to drain away from the network more effectively, whilst increasing the amount of water that could be held. It has	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		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	No works have been done on Canvey Lake in 10 years despite the 6 point plan	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained	N

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								been identified that any work on the lake would need to be followed by a regular planned maintenance programme.” 4.04 Canvey Lake is clearly one of the main assets within the Canvey Island surface water drainage system. Despite this and the findings of the government’s Chief Scientist, Sir Mark Walport’s, and the 6–Point Plan recognition, that it is “vital” for the Lake to be kept in good condition to perform its strategic function during storm events, no major work, nor maintenance, on the Lake has been undertaken, in the 10 years since the 2014 Summer Floods.			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 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								

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											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								

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											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								

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											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 is contrary to NPPF guidance and Planning Practise								

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											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								

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											this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection								

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											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.								
0 9 6 4- 0 0 0 1	Individual	Ree ce	Brac ci		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 2 9- 0 0	Individual	Car men	Bra dna m		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 1																			
0 6 6 1- 0 0 0 1	Individual	Bar bar a	Bra dy		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0 9 5- 0 0 0 1	Individual	Laur a	Bra dy		Yes	Wh ole Pla n	Yes	All green belt should be protected, the infrastructure of this area is at full capacity	Yes	Positively prepared			Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Protect all greenbelt Infrastructure	GreenBelt is not allocated within the Castle Point Plan Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
1 4 2 7- 0 0 0 1	Individual	Dan ny	Brad y		Yes	T1	Not Stat ed	The road infrastructure cannot cope with the amount of traffic we already have even weekends traffic is known to be at a standstill	Not Sta ted								The road infrastructure cannot cope with the amount of traffic we already have even weekends traffic is known to be at a standstill	Highways Impacts: The plan has been subject to detailed Transport Assessment, assessing impacts and recommending interventions.	N
1 4 2 7- 0	Individual	Dan ny	Brad y		Yes	Infr a3	Not Stat ed	The GP practices are overloaded and getting appointments is a genuine struggle. Local hospitals are at breaking point.	Not Sta ted								The GP practices are overloaded and getting appointments	Infrastructure matters, including health, are covered by	N

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0 0 2																	is a genuine struggle. Local hospitals are at breaking point.	policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
1 4 2 7- 0 0 0 3	Individual	Dan ny	Brad y		Yes	SP3	Not Stat ed	I am totally against any building on green belt or redefined green to gray belt.	Not Sta ted								Against any building on green belt or redefined green to gray belt.	Noted	N
0 6 8 3- 0 0 0 1	Organisatio n	Carl	Bra mpt on	Essex Archi tectur al Plann ing Limit ed	Yes	SP3	No	Does not meet Paragraph 32 of NPPF	No	Effective	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. On the outset, you may think that this seems a reasonable and good use of brownfield development sites.	The viability of developments need drastic review including the 5 year sustainable supply of housing.	No	Not Ans wer ed	Not Ans were d	A	Density and capability of building tall buildings on canvey Charfleets Flood Risk on canvey Third Road off Canvey Infrastructure	Density 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 storieson Canvey Island for this reason. Charfleets Charfleets Industrial Estate is included within Policy E1 which includes the statement '	N

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											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 on Canvey over 4 stories. 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								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'. 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. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it	

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											development if you are going above the existing properties? 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. 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								is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Third Road off Canvey The plan has been subject to detailed	

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											the town centre. Moving on to the biggest issue with this Local Plan, Policy C4 – West Canvey. The proposal 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. 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													Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three	

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											landowners, businesses and other parties that would be affected by development. 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. 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. Canvey Island has approximately 16,000 homes, in a development area of around 675 ha as you can see							projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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											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! 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. Lastly, I want to touch upon the infrastructure upon Canvey Island and the impact that this									

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											will have upon the local area. Canvey Islands issues typically surrounding Traffic, Drainage and Flooding. 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. 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. 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								

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											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. 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. I'm yet to even touch upon other								

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											community infrastructure that Canvey Island lacks such as Doctors, Dentists and School Places. 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.								
0 6 9 5- 0 0 0 1	Individual	Lind a	Bra nd		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 1 5 9- 0 0	Individual	Barr y	Braz ier		Yes	Wh ole Pla n	Yes	I fully support the Strategic policies SP1, SP2 and SP3 contained within the Castle Point Plan Regulation 19 Consultation. These policies are supported by detailed reasoned justification taking	Yes		I therefore believe the Plan to be sound in that it is - a) Positively prepared – providing a strategy which, as		Not Stat ed		No	A	Supports the Plan and considers it to be legally compliant and sound. These	Support noted.	N

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0 1								into account the constraints imposed, particularly the small land area of the Borough and the need to retain as much green space as possible for the well-being of the existing and future population. Paragraphs 6.3, 6.4 and 6.5 are particularly relevant. The ensuing policies within the Plan are consistent with, expand and develop this strategic approach.			a minimum, seeks to meet the area's objectively assessed needs and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.						policies are supported by detailed reasoned justification taking into account the constraints imposed, particularly the small land area of the Borough and the need to retain as much green space as possible for the well-being of the existing and future population. Paragraphs 6.3, 6.4 and 6.5 are particularly relevant.		
0 1 7 4- 0 0 0 1	Individual	Mau reen	Braz ier		Yes	Wh ole Pla n	Yes	Dear Sir I support the Castle Point Plan Regulation 19 Draft Consultation.	Yes		I believe that the current council (People's Independent Party) have worked tirelessly to present a plan which preserves the green belt areas of Castle Point. The very essence of Castle Point is the mix of		Not Stat ed		No	A	Supports the Plan The very essence of Castle Point is the mix of developed areas interspersed with fields and wooded areas. I support the	Support noted.	N

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											developed areas interspersed with fields and wooded areas. This gives breathing space for people to unwind by viewing from afar. Access to all is not needed, simply the chance to be able to stop and stare, and watch and hear the bird life or see horses grazing is all part of what makes this area such a good place in which to live. As does the chance to be able to hear what children are saying as they return home after a day at school rather than their voices being drowned out by passing traffic. And it is also vital to the abundant wildlife in the area. The fields, trees and hedges act as a bridge or corridor for wildlife to move along from the outer woodlands and fields. I support the council in their protection of green belt and their encouraging development on already developed						council in their protection of green belt and their encouraging development on already developed land or brown field areas.		

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											land or brown field areas. I consider the draft plan to be sound.								
0 1 1 2- 0 0 0 1	Individual	Tov a	Brea ch		Yes	Wh ole Pla n	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound I consent to my full name being published alongside my comments for this consultation.	Yes				Not Stat ed		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0 6 8 5- 0 0 0 1	Individual	Lorr aine	Brea ding		Yes	SP3	Yes		No	Justified	The proportion of new buildings being considered for canvey island is disproportionate to the size of the borough. It is also a flood plain and there is no guarantee that the infrastructure would be in place to allow for the ease of traffic to and from the island.	There would need to be a third access from the Island that does not go through waterside roundabout, sadlers farm roundabout or benfleet. There would also need to be better access to medical facilities and schooling. Canvey Island is classified as a deprived area and therefore for what is in effect a large housing influx there must be scope for more employment and training built in to the plan.	No	Not Ans wer ed	Not Ans were d	A	Third Road off Canvey Infrastrcture Flood Risk on Canvey Employment and Training	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	N

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

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																		education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by	

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																		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. Employment and Training Policy E3 encourages and supports development of local skills.	
0245-0001	Individual	Stephanie	Briggs		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'.	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	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to

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											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/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.	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) .
0 2 4 5- 0 0	Individual	Stephanie	Briggs		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at	Needs of emergency services considered in the supporting Infrastructure	N

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02																	risk with emergency evacuation procedures	Delivery Plan (IDP).	
0828-0001	Individual	Keith	Broadhead		Yes	HAD2 (Policy Map)	No	Factually incorrect. The cross-hatching representing the area and boundary of the farmland should coincide with the GREEN BELT boundary. This being the southern house fences of Castle Road, Park Chase, London Road [A 13] and western house fences of Tattersall Gardens.	No	Consistent with national policy	Drafting error requires correcting.	The cross-hatching representing the area and boundary of the Green Belt and farmland should coincide with the GREEN BELT boundary. This being the southern house fences of Castle Road, Park Chase, London Road [A 13] and western house fences of Tattersall Gardens.	No	Not Answered	Not Answered	A	HAD2 policy area to coincide with Green Belt boundaries	The area covered by Had2 has been specifically chosen to encompass Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes and is not intended to cover the extent of the Green Belt.	N
0828-0002	Individual	Keith	Broadhead		Yes	SP3	Yes	The difficulties of applying Government methodology for the whole of England, to the real situation pertaining to Castle-Point, is readily apparent when considered with the property facts given that 80% of homes are owner-occupied and the other 20% social or rented, As a resident of Hadleigh for some 10 years, the current housing density is now above 'comfortable' getting close to full. On-road parking is now at full capacity in residential roads and disabled mobility is severely impaired by obstructions such as vehicles parking on pavements and verges. Any more development will simply aggravate the already congested and inadequate infrastructure.	No	Justified		New planning permissions should require off-road parking for at least two vehicles. Grass verges are ruined by Illegal parking on kerbs or pavements and offenders should be effectively deterred. Pavements should have no sudden sharp changes of level as in Castle Lane. Licences (min £500) should be required for Utilities and others wishing to destroy the road surface. With 50% refundable on inspection and satisfactory reinstatement. Although further housing might be considered desirable by some there is absolutely no immediate NEED in Hadleigh.	No	Not Answered			No need for housing in hadleigh North West Thundersley	Housing need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the	N

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								As a long term objective the North West Thundersley proposal could be reconsidered (see Reg.18 Draft) for future residential development when the NEED and COST can be fully justified.										extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. North West Thundersley North West Thundersley is in the Green	

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																		Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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0 8 2 8- 0 0 0 3	Individual	Keith	Broadhead		Yes	HAD2	Yes		No	Effective	Changes to better define precise meaning.	Suggested text adjustments in added CAPITALS. Within the area as identified on the Policies Map, the Council will support the following land uses and proposals for AGRICULTURAL development: 1. Proposals related to the improvement of recreational facilities within the Country Park and maintenance of the Country Park where they do not have a significant impact on the landscape or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan; 2. NON-RESIDENTIAL OR NON-COMERCIAL proposals related to the development and/or use of the farm for agricultural and/or training purposes in line with the charitable mission of the landowner, where they do not have a significant impact on the landscape the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan; or 3. Proposals for habitat creation and habitat management and mitigation which are complementary to the habitats which already exist on or near the site, with specific regard to the Southend and Benfleet Marshes SPA and Ramsar site. 4. Development proposals must	No	Not Answered			More precise wording to policy HAD2	Comment noted.	N

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												be designed to enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS). 5. Development proposals must ensure areas that are identified as an Area of Particular Importance for Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS) are protected and where possible enhanced. Reasoned Justification (See 4, next comment for full modification) 10.18 The area to the south of Hadleigh Town Centre sits in the Green Belt. It is the site of the Salvation Army Farm which delivers training opportunities in line with the charitable mission of the Salvation Army. As farming practices change and develop, and the needs of the Salvation Army's clients also change, it will be necessary on occasions for the facilities at the farm to also change and adapt. 10.19 Essex County Council also manages Hadleigh Country Park. This was extended in 2012 to include land leased from the Salvation Army to provide the venue for the 2012 Olympic Mountain Biking. There are some amenities and facilities on this site for							

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												recreation including footpaths, multi-user paths, play equipment, café, toilets, parking, etc. There is also some small-scale ‘glamping’ provision. To ensure the viability of this facility into the long term it will be necessary on occasions for the facilities in the Country Park to change and adapt. 10.20 The site is however visually prominent, and provides the setting for Hadleigh Castle, a Scheduled Monument. It is therefore critical that any development allowed does not NEGATIVELY impact on the landscape. Furthermore, it is important that any recreational or farming activities are compatible with the nature conservation status of the area. 10.21 The southern part of the area is of significant nature conservation value. Benfleet and Southend Marshes Site of Special Scientific Interest (SSSI) covers an extensive area of the marshland and Hadleigh Ray creek, with a smaller area of this designated as a Special Protection Area (SPA) due to its importance as a habitat for birds. It is designated under international law as a Ramsar site due to the number of migratory birds present. Furthermore, the significance of the Hadleigh Castle and Marshes landscape is							

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												such that it has been identified as part of the nominated East Coast Flyway World Heritage site. 10.22 The LNRS identifies this area as a Strategic Opportunity Area. The Castle Point Green and Blue Infrastructure Strategy recognises the opportunities for remediation and ecological restoration to improve biodiversity in the short term, while habitat creation and improved connectivity between Hadleigh Park and Benfleet Marshes are a longer term aspiration.							
0 8 2 8- 0 0 0 4	Individual	Keith	Broadhead		Yes	HAD2	Yes		No	Effective	I feel the statement : ' The area to the south of Hadleigh Town Centre sits in the Green Belt. It is the site of the Salvation Army Farm which delivers training opportunities in line with the charitable mission of the Salvation Army. As	Hadleigh Farm is in the area to the south of Hadleigh Town Centre contained entirely within the Green Belt, which was itself already reduced in size by the effects of an earlier housing development. It is owned by the Salvation Army which produces regular cereal and other crops as well as offering training opportunities in line with its charitable mission. Furthermore, as farming practices change and develop, and the needs of the Salvation	No	Not Ans wer ed			Stronger wording to policy HAD2	Comment noted.	N

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											farming practices change and develop, and the needs of the Salvation Army's clients also change, it will be necessary on occasions for the facilities at the farm to also change and adapt.' should be stronger.	Army's clients will also change and it will be necessary on occasions for the farming facilities to also change and adapt.'							

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

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												facing the world today, affecting us all. Its effects fall disproportionately on the most vulnerable, particularly in terms of health, livelihood, shelter and the opportunity to make choices. The very survival of humanity depends on the health of the whole ecosystem. In addition to being compelled by lived experience, The Salvation Army also accepts the scientific evidence that demands action on all levels to lessen the effects of environmental damage. It is committed to sustainable environmental practices which are required to safeguard the integrity of creation. This positional statement was approved by the General in July 2021. I presume that the removal of the offer of sites made by the SA in the Reg 18 proposal, it has sensibly decided not to accidentally jeopardise its hard earned and excellent reputation by its retraction. There is no current NEED warranting use of Green Belt farmland currently safeguarded by the Act. The SA publications also proclaim: Our mission, vision and values. Our Values. Integrity We will be honest and transparent in all our dealings							

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												with each other and those we serve, being open about our motives and agendas; Mutual accountability We will willingly and freely give full account for our actions to those we interact with and expect the same in return, recognising the link between individual responsibility and mutual accountability. Nature,Birds & Crops [REDACTED Personal Information] and observe PLOT F in Reg 18 on a daily basis. Last year, far from being a non-viable barren field, it yielded 217 cylindrical bales of hay/ fodder together with the associated harvest of multiple trailers full of grain/cereal. In the Spring prior to planting, several hundred Brent Geese arrived and no doubt will regather this Autumn on the plot before migrating to their breeding grounds. Endangered Slow-worms have again been observed. Any farmland/Green Belt surrendered to housing is a permanent, avoidable, and irretrievable Nature . Such actions, if sanctioned, will rightly be condemned by future generations. Please accept that by this comment I seek to highlight that our forefathers by way of							

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												Parliament recognised Urban Sprawl as the curse that needed strict control and did so by implementation of The Green Belt (London and Home Counties) Act 1938. This should not be lightly surrendered to Private profit,							
0 1 4 9- 0 0 0 1	Individual	Mic hael	Bro wn		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site

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											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.						predetermine d 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.	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.	circumst ances, landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council’s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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0149002	Individual	Michael	Brown		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0152001	Individual	Daphne	Brown		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF	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	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

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											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.						Drainage 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.		Castle Point Strategic Flood Risk Assessment (SFRA).
0 1 5 2- 0 0 0 2	Individual	Dap hne	Bro wn		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 7 4 1- 0 0 0 1	Individual	Stan	Bro wn		Yes	Wh ole Pla n	Yes		Yes	Positively prepared			Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant	Support noted.	N
0 7 7 9-	Individual	Bar bar a	Bro wn		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 0 1																			
0 7 9 1- 0 0 0 1	Individual	Kell y	Bro wn		Yes	SP3	No	Failed to consider stragetie alternatives like 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. It doesn't meet the housing target for Castle Point. Site selection ignores greenbelt/greybelt against 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 of highest risk of flooding. SUDS measures are not appropriate for Canvey Island's	North West Thundersley site, 187Ha, a greenbelt/brownfield site option for 7500 homes. Reduce the urban housing target to 3500 homes 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.	N

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											unique geography and drainage infrastructure (it cannot cope now!). Over 3000 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. It is not just the drainage infrastructure that is an issue on Canvey, it already struggles with the current weight of traffic - access routes just cannot support this level of building.							The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231	

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																		homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has	

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																		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	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	
1 0 7 9- 0 0 0 1	Individual	Mal col m	Bro wn		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0 9 4- 0 0	Individual	Clair e	Bro wn		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 1																			
1 2 6 4- 0 0 0 1	Individual	Jack ie	Bro wn			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is 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 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						/ 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	2025. <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>Green Belt/Grey Belt</u> Green Belt/Grey	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		belt covered under policy GB2 and supporting Green Belt Assessments. 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.	
1 2 6 4- 0 0 0 2	Individual	Jack ie	Bro wn			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und ?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
								the overall site environment for the local residents.											
1 2 6 4- 0 0 0 3	Individual	Jack ie	Bro wn			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 4 3 1 - 0 0 0 1	Individual	Reb ecc a	Brut on		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 3 2 - 0 0 0 1	Individual	Davi d	Brut on		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 2 4 9- 0 0 0 1	Individual	Deb orah	Brya nt		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	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".	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						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	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	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).

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.	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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											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.								
0 2 4 9- 0 0 0 2	Individual	Deb orah	Brya nt		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 9 5 3- 0 0 0 1	Individual	Joh n	Bryc e		Yes	HA D4	No	The draft document leaves far too many relevant and significant points underdeveloped and inconclusive which legally should be resolved prior to seeking of approval e.g the provision of alternative sporting facilities where there is only a vague and indeterminate availability of additional funds and a reference to there being further discussions with the Council on alternative facilities without naming these there being no indication that such	No	Positively prepared, Effective, Justified	There are too many vagaries and incomplete explanations on the solutions to the relevant problems arising from this development e.g., parking of the additional vehicles which will be brought to site by new homeowners ; enhanced safety requirements for children attending	Please see some of my principal concerns in 3c . These are not matters to be dealt with by " any revised wording " .	No	Not Ans wer ed	Not Ans were d		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Lack of provision of alternative sporting facilities	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient	N

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								facilities with the requisite spare or additional capacity to cater for the usage now being removed from the site HAD4 Land South of Scrub Lane .			the school; full consultation on the loss of sporting facilities both for the general public and the school; enhanced child safety and protection arising from the increased presence of unknown adults; discussion on the ability and capacity of the affected schools to cope with the influx of additional children across the full age spectrum The foregoing list is not exhaustive. This was a poor effort and demands abandonment of the proposal altogether given the large number of relevant aspects which have been left unaddressed and /or poorly dealt with.						highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Loss of sporting facilities Policy HAD4 requires that the loss of the playing field is mitigated by an appropriate financial contribution towards new or enhances playing field facilities nearby.		

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
029-0001	Individual	Dean	Buckingham		Not Stated	Whole Plan	Yes	I believe the draught plan has been legally prepared and is sound	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0486-0001	Individual	Lorraine	Buckley		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS	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.	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. 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 of Brownfield	<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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						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 .	approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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.	Strategic Flood Risk Assessment (SFRA).

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																		<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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		been considered through the SFRA.	
0486-0002	Individual	Lorraine	Buckley		Yes	C4					The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		No				The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0 9 6 7- 0 0 0 1	Individual	Kell y	Bulli s		Yes	HA D2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Ans wer ed	Not Ans were d	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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											the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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																		again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North	

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																		West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the	

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																		natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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																		site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0 9 6 7- 0 0 0 2	Individual	Kell y	Bulli s		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Ans wer ed		A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Flood risk on Canvey Overdevelop ment of brownfield sites	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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											alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.							and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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																		again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North	

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																		West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the	

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																		natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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																		site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flood risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood	

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																		management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Density The density for sites allocated within the plan has been informed by the Density and Capacity Study July 2025, please see this for further details.	
0967-0003	Individual	Kelly	Bullis		Yes	HA D4	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Revise Scrub Lane development to 20 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered		A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5	N

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											predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, 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							to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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											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 Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114								

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

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0 9 6 7- 0 0 0 4	Individual	Kell y	Bulli s		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000. Dredge Canvey Lake !!	No	Not Ans wer ed		A	Support for Policy C7	Support noted.	N

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											resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Adding the North West								

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. I do agree with Policy C7 about improving the Canvey Lake. This needs to deliver an increased capacity of the Lake from dredging for flood water storage, reduce the flood risk, a long-term management plan of the lake, improve and maintain water quality, enhancements to the habitat surrounding the lake, an environment to create an attractive and functional area, and also identified as an area of particular importance for biodiversity within the Essex Local Nature Recovery Strategy. I concur with the many statements made within this policy, that Canvey								

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											Island suffers from high levels of surface water flood risk, and with higher rainfall Canvey Lake becomes an important depository for excess rainwater, poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve this natural environment, and how surface water runoff contaminates should be managed, the Canvey Island 6 Point Plan was undertaken in 2015, about Canvey and recommended the capacity of the lake should be investigated and achieved through to provide additional storage capacity, and that Canvey Lake acts as a habitat to many different wildlife, including waterbirds and some aquatic life with the risks to wildlife due to the water quality.								

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											This is the vision we need for Canvey Lake.								
0 7 3 5- 0 0 0 1	Individual	Sea n	Burk e		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 1 3 - 0 0 0 1	Individual	Iris	Burl		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 5 9- 0 0 0 1	Individual	BAR RY	BUR NET T		Yes	HA D2	No		No	Positively prepared, Effective, Justified, Consistent with national policy	Finally, as a resident I gain much enjoyment from the open spaces and vistas within Castle Point. I must therefore register		No	Not Ans wer ed	Yes	A	Support for not building on Hadleigh Farm (HAD2)	Support noted.	N

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											my strong approval and support for Policy Had 2 within the Castle Point Plan. This is our heritage, and I believe that no changes should be made on these lands which would result in a significant impact on the landscape.								
0 7 5 9- 0 0 0 2	Individual	BAR RY	BUR NET T		Yes	SP3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	1. I do NOT believe that the Castle Point Plan is fully legally compliant 2. I do NOT believe that the Castle Point Plan is sound 3. I believe that the proposal for over 3.3K homes on Canvey Island is disproportional and fails to fully consider all environmental and infrastructure impacts 4. In my opinion the site in North West Thundersley should be included in the Plan 5. I do not consider that a sound projection for five-year housing land supply has been provided. In my opinion the Plan in its current state does not meet the legal tests of soundness		No	Not Ans wer ed	Yes		Environmenta l impacts Infrastructure impacts North West Thundersley Five year housing land supply DTC	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is	N

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											and compliance. There appears to be a sense of isolationism in the plan, in that there is little within the plan to demonstrate that the impact of the proposals have been discussed with adjoining authorities, and in my opinion it has the appearance that several assumptions have been made and left unchallenged. My major concern is that the NW Thundersley site labelled as GB16 on the Reg 18 Consultation, although mentioned within the Sustainability Appraisal, has apparently been rejected with little justification. I acknowledge the good intentions of the premise that no Green Belt is to be included in the Plan, but I strongly believe that under the present governmental circumstances compromises have to be made, and that there is a very strong case for the							deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. No Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to 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	

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											inclusion of this site. Indeed, failure to include this, or any other Green Belt, would lead any review to question whether all suitable sites within the borough have been identified and considered for inclusion, and this in itself puts the credibility of the plan into question. The failure to properly consider and robustly discuss this site also undermines the Sustainability Appraisal. Additionally, the Plan does not contain a deliverable five-year supply of housing land for either the Government’s or Council’s housing targets. Taking all of this together my opinion is that the absence of robust and transparent discussion to competently indicate that all potential sites have been considered is worrying. This failure leaves all of								and not the Government’s Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council’s aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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											Castle Point’s Green Belt (with a potential for development) open to speculative development. For these reasons I do not believe that the draft plan is legally compliant in the current state, and requires further revision to ensure that development is sustainable, justified, and in the public interest. I was also very surprised to see the high density of housing suggested for Canvey given the drainage issues and risk of flooding, plus the problems with accessibility due to infrastructure restrictions. The housing target imposed by the Government is ludicrously large, and impossible given the infrastructure and fragile nature of the area. This must be resisted, else the character and social structure of Castle Point would the irrevocably								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. Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met	

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											damaged. However, I do not believe that the Plan has gone far enough in discussing and justifying why the significantly lower numbers are more appropriate than those dictated by central Government. As mention above, the case is severely weakened by the rejection of the NW Thundersley site. Worryingly, without proper justification the Plan aims to only achieve around 53% of the housing target over the 17-year plan period. The exclusion of NW Thundersley undermines the claim that the Plan has been positively prepared. With a plan that offers just over half of the Governments housing requirements with NW Thundersley rejected and no other Green Belt sites included I believe that the Planning Inspector will insist on Green								

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											Belt being made available – and this would mean that all such areas In the borough would be up for speculative planning applications whilst the council deliberates on which areas should be sacrificed. Worse still, the plan is open to the Secretary of State taking such powers away from the Council and arbitrarily deciding where the full Government quota of houses should go. Although Green Belt sites should be protected in the plan, I believe that NW Thundersley should be considered as an exception; a sacrifice to make the plan robust and protect the remainder of the Green Belt areas. This area is a mix of Green belt, Grey Belt and Brownfield sites, offering the opportunity for infrastructure-led growth in a								

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											sustainable location and so doing would relieve pressure on more vulnerable areas. I have read elsewhere that the Blinking Owl site alone has the potential for over 5,000 homes, and whilst the NW Thundersley area has some Green Belt, the site mostly comprises Grey Belt plotlands, light industrial units, and inaccessible land. This would provide the exciting prospect of developing a new zone for sustainable growth. With careful planning I understand that there is sufficient area to build here and also to maintain the vital buffer between Benfleet and Thundersley. The inclusion of this site would make the 17 year plan more robust, potentially delivering a housing target nearer to that dictated by Central Government.								

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0 8 3 7- 0 0 0 1	Individual	Bar bar a	Bur nett		Yes	HA D2	No	The plan does not appear to make provision for a reliable 5 year housing supply demand. Being based on a premise of no building on greenbelt land the plan has failed to fully consider alternative sites such as North West Thundersley.	No	Justified, Consistent with national policy	Firstly I must register my strong approval and support for Policy Had 2 within the Castle Point Plan. I agree with the premise of the plan which recognises the Hadleigh Farm area as being environmentally important; this is our heritage, and I believe that no changes should be made on these lands which would result in a significant impact on the landscape. I also agree with the principle that this Greenbelt site is not suitable for development. However, I do not believe that the overall current plan is consistent with national policy; it does not meet the Government's housing target, and thereby puts the Hadleigh Farmland site at high risk of speculative development proposals. Additionally, not all the potential	Add North West Thundersley site to the plan. This is a mix of green/grey belt land with the potential to provide 7500 houses. Doing this would relieve the pressure to build on already populated areas such as Canvey.	No	Not Ans wer ed	Not Ans were d	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											sites in the area appear to have been considered; the site selection has ignored areas of mixed green and grey belt which could be utilised and therefore does not fully adhere to my understanding of the new NPPF guidelines. Further, this policy decision not to build on greenbelt land has resulted in a proposed overdevelopment of brownfield sites.							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.	

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																		North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the	

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																		requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were	

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																		promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted.	

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1 2 5 9- 0 0 0 1	Individual	Eric	Bur nha m			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 5 9- 0 0 0 2	Individual	Eric	Bur nha m			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 2 5 9- 0 0 0 3	Individual	Eric	Bur nha m			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 8 5 7- 0 0 0 1	Individual	Neil	Burr ell		Yes	HA D4	Yes		No	Effective	By adding 114 new homes existing gp provisions will be put under serious strain more so than it currently is. Plus other amenities will struggle.		No	Not Ans wer ed	Not Ans were d		Objecting to HAD4 due to infrastructure	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
0 8 6 0- 0 0 0 1	Individual	Joan	Burr ell		Yes	HA D4	No	Not enough infrastructure to cope with 114 extra houses. Traffic wise the road can be like a traffic jam if there are problems on the A13 or A127 Scrub Lane is used as a cut through. With all the extra cars more housing would bring cars will struggle to move. We need more doctors as you can't get appointments now let alone having 200 plus more people possibly needing treatment.	No	Effective	Not practical		No	Not Ans wer ed	Not Ans were d		Objects to HAD4 due to traffic on scrub lane and infrastructure	Traffic Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Infrastructure Infrastructure matters	N

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																		(including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0 3 8 5 - 0 0 0 1	Individual	Luk as	Burr y		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at	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			A	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. 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						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 .	housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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	

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																		was not preferred. <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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> 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.	

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																		Canvey SuDS options have been considered through the SFRA.	
0 3 8 5 - 0 0 0 2	Individual	Luk as	Burr y		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergancy evacuation procedures.					A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 3 8 5 - 0 0 0 3	Individual	Luk as	Burr y		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	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	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. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water	No			A	Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required	
											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. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey-is not resident led.	quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.						Canvey Lake	maintenance of the lake is upkeep and will detail who is responsible for this.	

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											Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective· because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding								

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water.quality threatens users, animals and biodiversity. However, without concrete delivery-mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								

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0 3 8 9 - 0 0 0 1	Individual	Har vey	Burr y		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.					A	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. 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	<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. <u>Housing Supply</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	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 .	– 5 Year Supply Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability	

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																		Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
0389	Individual	Harvey	Burry		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West					A	The number of Canvey West homes puts	Needs of emergency services considered in	N

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-0002											homes puts residents in the East at risk with emergency evacuation procedures.						residents in the East at risk with emergency evacuation procedures	the supporting Infrastructure Delivery Plan (IDP).	
0389-0003	Individual	Harvey	Burry		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	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	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. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.				A	Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the maintenance of the lake is upkept and will detail who is responsible for this.	N

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											unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery								

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											mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake								

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											serves as an important rainwater depository, and current poor water.quality threatens users, animals and biodiversity. However, without concrete delivery-mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								
0 1 7 3- 0 0 0 1	Individual	Mar k	Burt on		Yes	SP3	No	Dear Sir/Madam, I am writing to formally object to the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT support the draft plan, as I do not consider it to be legally compliant or sound. Legal Compliance The plan fails to consider strategic alternatives such as North West Thundersley. * It does not provide a credible five-year housing land supply.			Soundness The draft local plan is not justified or consistent with national policy. The housing target for Castle Point is not being met appropriately. he 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	Proposed Modification Add North West Thundersley as a housing site option.	Not Stat ed		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..	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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 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.						Canvey Island is uniquely vulnerable due to its geography and drainage infrastructure , making large-scale development unsafe. Building 3,300+ homes on Canvey will put residents at significant risk in the event of an emergency evacuation. The current plan does not address essential infrastructure improvements required to support this scale of development.	supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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1 1 8 9- 0 0 0 1	Individual	Jane t	Burt on			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 8 9- 0 0 0 2	Individual	Jane t	Burt on			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 1 8 9- 0 0 0 3	Individual	Jane t	Burt on			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 4 3 6- 0 0 0 1	WITHDRAWN																		

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0 0 0 1- 0 0 0 1	Individual	Joh n	Butt		Yes	SP3	Not Stat ed	If further developments on Canvey Island then a third road for access on and off the Island required. A third road has been promised since the 1980s for further access to Canvey Island. It's taken you 40 years to finish the sea wall. Now it is 49 years overdue for a Third access road to Canvey Island	Not Sta ted	Not Stated							Objects to housing development in Canvey island. Development on Canvey needs a third access road, promised since the 1980s and still undelivered.	Noted. Development must demonstrate infrastructure sufficiency or secure mitigation, as set out in INFA policies.	N
1 4 4 6- 0 0 0 1	Individual	Joh n	Butt			SP3	Not Stat ed	Canvey Island butchered again. Massive development with on infrastructure. Just as always. Canvey Island the dumping ground for what castle point does not want. Always has been since the formation of Castle point. I have lived on Canvey Island [REDACTED] and watched it's destruction since castle point was formed.	Not Sta ted								Canvey Island butchered again. Massive development with on infrastructure . Just as always. Canvey Island the dumping ground for what castle point does	Infrastructure: Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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																	not want. Always has been since the formation of Castle point. I have lived on Canvey Island [REDACTED >] and watched it's destruction since castle point was		
1 0 1 8- 0 0 0 1	Individual	Viv	Bygr ave		Yes	C4	Yes	This is a guarded 'yes' as I can only assume Castlepoint Council act in a lawful manner at all times as I have elected them to have this specific knowledge and expertise	No	Positively prepared, Effective, Justified	It should meet the needs of the area, it does not meet the needs of the residents current and future of Canvey island. Who would want to live on Canvey Island when the traffic system is insufficient to allow exit from the island especially at rush hour and times of emergency when traffic is at a standstill maybe for 2 or 3 hours. People need more affordable housing off the island to reduce the substantial pressure on all the services currently available on Canvey which do not meet the needs of many	1. To increase the density of homes on Canvey it is crucial to improve infrastructure by upgrading the sewage and rainwater collection systems currently uses 3 inch (not standard 6 inch pipes0 so so it can genuinely cope with the needs of residents on the island . New housing increases a system already under severe strain because the new developments use the larger pipes which have greater flow which then feed into the narrow pipes and create blockages and other problems. Recently where I live two roads have been closed for many weeks where the road collapsed and the sewer had to be rebuilt and then the road restored. 2. Especially with proposals at C4 another exit MUST be provided off the Island, extending and connecting to Stanford Le Hope/Corringham at junction with Thames Gateway and thus to A13 using the part built emergency route at Charfleets past the new cemetery would be an	Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	formed. Gas hazards Emergency services Green/Grey Belt Flood risk on canvey Infrastructure Third road onto Canvey	Gas Hazards As set out in Plan paragraph 8.28 'Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development.	N

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											current residents not to mention another over 3000 homes. There is one access/exit roundabout through which ALL traffic must travel to leave or enter the island that cannot cope well at many times of the day for the existing approx 45 000 residents , it can t cope with more traffic. It is a frequent occurrence that the roads are blocked in a gridlock which sometimes reaches far back through the town centre, this may be a simple accident or broken down vehicle as the main roads are single tracked . Even an accident on the A130 or as far away as the Dartford tunnel can cause a standstill of many hours on Canvey and reduce safety on the island. there here have been serious disasters such as the aviation fuel tanker that caught fire at Sadlers farm	appropriate solution. 3. To fully consider the needs of the proposed homes and the residents . The plan says infrastructure ahs been considered but no details are specified and thus it is unsound. Canvey residents are fed up 'being done to' . We ve fought long and hard for years - against the methane gas storage and the 'creeping gas underground' which persists, the oil and now Calor gas and Aviation fuel, with inadequate overloaded roads so that in an emergency not only is it impossible to get off the island in a timely manner but Emergency services cannot easily access or exit the Island causing further risk to life.							Both installations have HSE consultation zones identified around them, in which it is expected that other development is controlled to limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management	

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											and mains water bursts at Tarpots that stopped traffic flow for several days on the island. The new retail development at Charfleets has attracted more traffic to the Island sometimes it is difficult to access the roundabout from Waterside as the oncoming traffic has right of way. Building 2000 homes - a huge development- with potentially another 4000 cars will dramatically affect the viability of the Waterside roundabout and further impede the traffic trying to exit the Island From Somnes Ave. There is no provision for the numerous childcare places that will be needed. Currently childcare is being offered in converted shops and offices with little or no space for the children to have outdoor play which is crucial to their learning because of the lack of available							and maintenance, and also at the point where new development is proposed.’ The current HSE consultation zones are indicated on the policies map. The plan doesn’t propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site. Policy SD8 ‘Development near Hazardous Uses’ states that ‘Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or	

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											land for good quality childcare facilities. There is NO GREEN BELT on Canvey apart from the RSPB sanctuary. The land is already dense with closely built housing with tiny gardens in many instances, outdoor play spaces and leisure areas are already limited and totally inadequate for so much more housing. You can t create leisure spaces when the Island is covered with housing. Whereas off the Island Hadleigh and Benfleet have the luxury of far more green spaces and parks and sport etc so some of their green/grey belt could be used for housing to alleviate the problems of living on Canvey, not exacerbate them. We have no woods on Canvey, maybe Benfleet could do with one less and houses could be built there instead of 2000 crammed into an area prone to flooding and a							more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds'. Emergency services Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). 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	

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											such a short distance from major industrial dangers such as Calor gas storage and aviation storage and distribution on the limited and busy 'highways'. with a mere retained fire service in case of emergency							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	

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																		addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the	

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																		design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Third Road onto Canvey The plan has 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	

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

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

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0 5 8 6 - 0 0 0 1	Individual	Sue	Byrne		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 8 6 - 0 0 0 2	Individual	Sue	Byrne		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 8 6 - 0 0 0 3	Individual	Sue	Byrne		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
1 0 9 0- 0 0 0 1	Individual	Christine	byrne		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1 3 3 2- 0 0	Individual	S	Byrne			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust,		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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0 1											make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.								
1 3 3 2- 0 0 0 2	Individual	S	Byrne			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	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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.	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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											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.							It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year	Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																		housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West	

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																		Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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																		Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 3 2- 0 0 0 3	Individual	S	Byrne			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1 2 4 7- 0 0 0 1	Individual	Coli n	Byw ater			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 4 7- 0 0 0 2	Individual	Coli n	Byw ater			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 2 4 7- 0 0 0 3	Individual	Coli n	Byw ater			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 4 8 4 - 0 0 0 1	Individual	J	C Wat han		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental,	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No		Ado ptio n, Futu re revis ions	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate,	N

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											recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open							sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land	

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											space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver	

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																		against new housing targets. In the first ten years of the plan the Council’s aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.	

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																		Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several	

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																		clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green	

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																		Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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1 0 2 7- 0 0 0 1	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey c/o Lichfi elds	Yes	SP1	Yes		No	Effective, Consistent with national policy	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'. 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	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 Ans wer ed	Not Ans were d	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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											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). 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 other policies in this Framework. 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									

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											and no distinction as to what 'green spaces' require protection through the NPPF and other legislation and which do not.								
1 0 2 7- 0 0 0 2	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	Yes	SP3	Yes		No	Positively prepared, Justified, Consistent with national policy	Policy SP3 states that the Castle Point Plan will deliver a minimum of 6,196 new homes over the period 2026-2043. In paragraph 6.52 of the draft Local Plan it is recognised that the current target for Castle Point, as established using the standard methodology set out in the revised NPPF of December 2024, is 686 new dwellings per annum. This equates to 11,662 over the Plan period. Paragraphs 61 and 62 of the NPPF state that to support the Government's objective of significantly	The draft Plan is not Sound, as it is not 'positively prepared', it is not 'justified' and is not consistent with national policy. The draft Plan does not seek to deliver the minimum number of homes needed, based on the standard method, and could and should explore, at a much more granular level, options to meet the Government's standard method derived housing need.	Yes	Not Ans wer ed		A	Does not meet housing targets North West Thundersley	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not	N

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											boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community. 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. Paragraph 146 of the NPPF states that Green Belt boundaries should be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances in								considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.	

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											this context include, but are not limited to, instances where an authority cannot meet its identified need for homes through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in the Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. The draft Plan states that the evidence base has shown that achieving that target would significantly and irreversibly destroy large tracks of Green Belt, including								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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											land which strongly contributes to the Green Belt purposes, and undermine the approach to protecting and enhancing the natural environment set out in policy SP1, by impacting on protected areas and frustrating a landscape scale approach to green infrastructure and nature recovery. Furthermore, transport modelling has shown that the road network in Castle Point operates at capacity already, and the impacts of growth would be severe. There are also constraints related to health service provision. Demand on health services in South East Essex have grown but this has not been aligned with sufficient revenue funding to meet needs. Consequently, whilst this Plan could reasonably secure new health								

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											facilities, the local health services are unable to resource such facilities with staff. However, the 2025 Green Belt Review does not consider all land parcels in the Borough and there are significant areas that were not assessed. The 2018 Review considered wider parcels that did cover the Borough, but one large area (central corridor) was totally ruled out because: “These parcels of Green Belt serve to restrict the settlements of South Benfleet and Thundersley from merging and also create a connection between the northern Green Belt parcels within the borough to those in the south. Without this linkage, the demarcation of these two urban areas would be indistinct and the								

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											wider Green Belt of Castle Point would become additionally fragmented. At a sub-regional level this corridor is particularly important as it plays a role in linking the strip of Green Belt running along the Thames Estuary to the Green Belt extending between Rayleigh and Wickford and across towards Basildon” These were large areas and no further detailed analysis was undertaken on smaller parcels within these areas – for example the Central Corridor which varies significantly in land area between the north, the south and the middle. The 2025 Green Belt Assessment assessed smaller parcels, but this was selective and did not comprehensively cover the whole Borough. There is								

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											limited or no valid justification as to why only a few particular sub-areas were selected. The Green Belt Review 2025 is flawed, as it should comprehensively review all Green Belt land. For example, the 2025 Assessment states that the Council previously identified an area of 160ha GB16 (North West of Thundersley) as a potential Green Belt site option and this was assessed at a parcel level (as parcel 1) in the 2018 Green Belt Review. Paragraph 5.1.2 of the 2025 assessment states: ‘Parcel 1 possesses a complicated fabric with fragmented land ownership and a varied planning history and contexts relating to individual sites. It is therefore deemed to be inappropriate to assess this as a									

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											sub-area within our assessment and instead sub-areas have been assessed at a more appropriate level of granularity’ (para 5.1.2). However, this is not appropriate reason to exclude large areas of the land from the GB review, given that the site was considered by the Council as a potential option to meet the housing requirement and that the Council should be appropriately assessing all options. To add to this point, it should be noted that within in Parcel 1 there is much land that has been identified as being ‘potential grey belt’, as set out in Figure 18 of the 2025 assessment. This would be a further reason for giving careful consideration to potential new development in that Parcel to								

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											meet identified needs. On the other concerns raised by the Council regarding this larger area, it is evident that the Council has failed to consider the scope for mitigation of these impacts. In the context of the above and by way of an example of how the current draft Local Plan has not fully assessed all options - the Issues and Options Consultation Document of July 2024 identified Option 3 for accommodating the growth needs of the Borough. This Option was to release significant areas of Green Belt to meet the standard method need and this included land at north west Thundersley. It is noted on page 52 of the Consultation document that “Land would be								

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											identified following a Green Belt review, and any substantial Green Belt sites would include proportionate employment, infrastructure, and services to balance the increase in new homes”. The ‘pros’ of this option are listed as: - Local housing need is exceeded, producing extra choice in the local housing market. - Relatively high infrastructure contributions. - This level of growth will generate surplus labour, which may have positive consequences for the local economy. These would, therefore, address the concerns raised above, but the Council has chosen not to explore such an option. The ‘cons’ include: significant environmental impacts arising from the								

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											development of greenfield land; and increased population ‘may’ increase out commuting and associated congestion on local roads and the strategic road network. However, there was no evidence produced showing significant environmental impacts on designated sites (there are very few) and no evidence of out commuting is provided. The draft Plan is not Sound, as it is not ‘positively prepared’, it is not ‘justified’ and is not consistent with national policy. The draft Plan does not seek to deliver the minimum number of homes needed, based on the standard method, and could and should explore, at a much more granular level, options to meet the Government’s standard method derived housing need.								

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1 0 2 7- 0 0 0 3	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	Yes	GB1	Yes		No	Effective, Consistent with national policy	Policy GB1 is not consistent with the NPPF and should be amended to reflect national policy. Paragraph 153 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness , and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraph 154	Policy GB1 is not Sound as it is not consistent with the NPPF or effective. It should be amended to align with the NPPF.	Yes	Not Ans wer ed		A	Is of the view that it is not consistent with the NPPF	The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the 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	N

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											notes that development in the Green Belt is inappropriate unless one of the listed exceptions apply. Policy GB1 is not Sound as it is not consistent with the NPPF or effective. It should be amended to align with the NPPF.							network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. 2018 Green Belt Assessments still form part of the evidence	

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																		and considered wider areas.	
1 0 2 7- 0 0 0 4	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	Yes	GB2	Yes		No	Consistent with national policy	In the heading Policy GB2 states 'previously developed land', whereas the policy also covers grey belt land and, as made clear in the glossary of the NPPF, that does not need to be just previously developed. The heading should be changed to reflect what the policy covers. Point 1b should also be amended to reflect the wording in paragraph 155a of the NPPF namely '...not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan'. This should also allow for the potential scope to make the case that a site is grey	See above - Policy GB2 is not Sound, as it is not consistent with the NPPF. It should be amended to reflect the NPPF.	Yes	Not Ans wer ed		A	In the heading Policy GB2 states 'previously developed land', whereas the policy also covers grey belt land and, as made clear in the glossary of the NPPF, that does not need to be just previously developed. The heading should be changed to reflect what the policy covers. Point 1b should also be amended to reflect the wording in paragraph 155a of the NPPF namely '...not fundamentall y undermine	Grey Belt is addressed across the Green Belt policies and is not specific to GB2. Part B reflects the NPPF without duplicating it which is not the purpose of a Local Plan Part e ensures the proposals comply with other policies in the plan which is considered necessary.	N

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											belt, even if it is not identified in the Green Belt Review as this does not review all of the Green Belt land comprehensively (paragraphs 1.1.3 and 5.1.1 of the Green Belt Assessment 2025). Part e is not required. Policy GB2 is not Sound, as it is not consistent with the NPPF. It should be amended to reflect the NPPF.						the purposes (taken together) of the remaining Green Belt across the area of the plan'. This should also allow for the potential scope to make the case that a site is grey belt, even if it is not identified in the Green Belt Review as this does not review all of the Green Belt land comprehensively (paragraphs 1.1.3 and 5.1.1 of the Green Belt Assessment 2025). Part e is not required. Policy GB2 is not Sound, as it is not consistent with the NPPF. It should be amended to		

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																	reflect the NPPF.		
1 0 2 7- 0 0 0 5	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	Yes	ENV 1	Yes		No	Consistent with national policy	Paragraph 2 of Policy ENV1 refers to ‘protect’; however, this is not aligned with national policy. Paragraph 187 of the NPPF states that planning policies and decisions should ‘contribute to and enhance the natural and local environment’ 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). The list of features covered in paragraph 2 are not such designated sites or features. Paragraph 188 of the NPPF states that plans should:	Policy ENV1 is not Sound as it is not consistent with the NPPF. It should be amended accordingly – ‘Development proposals should seek to minimise harm and where practicable enhance key natural/ semi-natural and historical features’.	No	Not Ans wer ed		A	Paragraph 2 of Policy ENV1 refers to ‘protect’; however, this is not aligned with national policy. Paragraph 187 of the NPPF states that planning policies and decisions should ‘contribute to and enhance the natural and local environment’ by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurat e with their statutory status or identified quality in the	Noted	N

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											distinguish between the hierarchy of international, national and locally designated sites. The policy should do this. Policy ENV1 is not Sound as it is not consistent with the NPPF. It should be amended accordingly – ‘Development proposals should seek to minimise harm and where practicable enhance key natural/ semi-natural and historical features’.						development plan). The list of features covered in paragraph 2 are not such designated sites or features. Paragraph 188 of the NPPF states that plans should: distinguish between the hierarchy of international, national and locally designated sites. The policy should do this. Policy ENV1 is not Sound as it is not consistent with the NPPF. It should be amended accordingly – ‘Development proposals should seek to minimise harm and where practicable enhance key natural/ semi-natural and historical features’		

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1 0 2 7- 0 0 0 6	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	Yes	ENV 3	Yes		No	Effective, Justified	Paragraph d (ii) of Policy ENV3 is not national guidance. Paragraph: 006 Reference ID: 74-006-20240214 of the PPG states that “plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified”. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented. It is noted that Essex County Council have commissioned work on the 20% BNG, but there should be a local	Amended to minimum 10% BNG. To justify such policies for 20% they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.	Yes	Not Ans wer ed		A	Objects to BNG 20% requirment and the evidence for it.	As set out in paragraph 18.29 'Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex'.	N

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											assessment undertaken to support such a policy in the local plan. Policy EN3 is not Sound as it is not effective or justified and should be amended accordingly.								
1 0 2 7- 0 0 0 7	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	Yes	ENV 6	Yes		No	Positively prepared, Justified	Paragraph 188 of the NPPF states that plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. In the footer a specific comment is added that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. All of the agricultural land in the Borough is Grade 3 and no detailed assessment has been undertaken of the agricultural	see above	No	Not Ans wer ed		A	Paragraph 188 of the NPPF states that plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. In the footer a specific comment is added that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to	Noted. There are significant ares of Grade 4 in Castle Point.	N

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											quality of the land in the Borough, beyond the Agricultural Land Classification Maps, to establish whether any is grade 3a. In these circumstances, and given the significant need to allocate land for housing, the application of the 'precautionary principle' to agricultural land is not justified. Policy ENV6 is not Sound, as it is not justified and not positively prepared						those of a higher quality. All of the agricultural land in the Borough is Grade 3 and no detailed assessment has been undertaken of the agricultural quality of the land in the Borough, beyond the Agricultural Land Classification Maps, to establish whether any is grade 3a. In these circumstances, and given the significant need to allocate land for housing, the application of the 'precautionary principle' to agricultural land is not justified. Policy ENV6 is not Sound, as it is not justified and		

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																	not positively prepared		
1 0 2 7- 0 0 0 8	Agent	c/o age nt	c/o age nt	Taylor Wimp ey	Yes	T2	Yes		No	Consistent with national policy	Point 7 of Policy T2 states that the Council will resist development that would impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions. However, paragraph 116 of the NPPF states 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. Policy T2 is not Sound as it is not consistent with	Policy T2 is not Sound as it is not consistent with the NPPF. It should be amended to refer to an 'unacceptable' impact and where cumulative impacts on the road network 'would be severe'.	No	Not Answered		A	Point 7 of Policy T2 states that the Council will resist development that would impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions. However, paragraph 116 of the NPPF states 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	Comments noted, please see modifications added.	7. The Council will resist development that would cause unacceptable impact on the effective operation , safety or resilience of the A13, A127 or A130, or associated junctions or where cumulative impact on the road network would be severe.

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											the NPPF. It should be amended to refer to an 'unacceptable' impact and where cumulative impacts on the road network 'would be severe'.						network, following mitigation, would be severe, taking into account all reasonable future scenarios. Policy T2 is not Sound as it is not consistent with the NPPF. It should be amended to refer to an 'unacceptabl e' impact and where cumulative impacts on the road network 'would be severe'.		
1 0 2 7- 0 0 0 9	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	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 Ans wer ed		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 Environemnt Agency and ECC (Lead Local Flood Authority). The LPA will ask the Examining Inspector to recommend any mods which they believe are	N

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																		necessary for soundness.	
1 0 2 7- 0 0 1 0	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	Yes	SD4	Yes		No	Justified, Consistent with national policy	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. 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	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 (cosnistent with national policy). The Policy must be robustly tested for practicability, deliverability and feasibility.	No	Not Ans wer ed		A	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	Noted	N

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											planning and operational stages of emerging developments, by the housebuilding sector and Local Planning Authorities. 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, 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						for this. Objects to this policy on the following basis: • 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 regulations (which is a challenge in particular for volume housebuilders, as above). • 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		

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											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. TW therefore objects to this policy on the following basis:						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		

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											- 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 regulations (which is a challenge in particular for volume housebuilders, as above). - 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						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 clear what constitutes "as-built performance" - the policy needs to be clear what is being proposed to prevent		

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											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							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 SD4 should be carefully reviewed and re-drafted so that the requirements are brought in line with building regulations and national requirements		

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											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 SD4 should be carefully reviewed and re-drafted so that the requirements are brought in line with building regulations and national requirements						(cosnistent with national policy). The Policy must be robustly tested for practicability, deliverability and feasibility.		

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											(cosnistent with national policy). The Policy must be robustly tested for practicability, deliverability and feasibility.								
1 0 2 7- 0 0 1 1	Agent	c/o age nt	c/o age nt	Taylo r Wimp ey	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	Delete part 4.	No	Not Ans wer ed		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

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											Water Recycling Centre that will serve the development.’ However, Water Companies have an obligation under the Water Industry Act to connect to the public 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. Therefore, Policy SD9 it is not sound - Part 4 is not necessary or						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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											effective, and it should be deleted.								
0353-0001	Organisation	Hyacinth	Cables	NHS Property		SP4		NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care. General Comments on Health Infrastructure to Support Housing Growth The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the							A	Draft Strategic Policy SP4 states that, where necessary, new developments will be required to provide for the necessary on-site or off-site infrastructure requirements arising from the proposal, including improvements and expansions of healthcare facilities in reference to the IDP (Supporting Paragraph 6.62). Policy Infra3 particularly concerns seeking planning obligations or CIL to	Policy SP4, is a high level strategic policy, and the importance of working in partnership with the NHS regarding specific health related infrastructure is covered elsewhere in Policy Infra3. NPPF paragraph 16 notes that Plans should avoid unnecessary duplication. It is considered implicit in Policy Infra3 that the council will work ‘in partnership with the NHS and Public Health’ (paragraph a); that contributions will be sought to new or enhanced	N	

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								funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area. Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure’s strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation. Detailed Comments on Draft Local Plan Policies													mitigate impacts of new developments on health provision. As drafted Strategic Policy SP4 does not sufficiently reflect the engagement process required when assessing the likely level of healthcare infrastructure required to support the level of growth proposed by the plan. Supporting paragraph 6.64 stipulates the Council’s consideration of the ECC Developers’ Guide to Infrastructure Contributions , and we also note the published Healthcare Facilities Developer	health facilities (paragraph b); that Health Impact Assessments should be undertaken ‘at an early stage’ (paragraph i);.and agreed with ‘public health professionals prior to commencement of the assessment at the earliest opportunity’ (paragraph h).	

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								Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible. Draft Strategic Policy SP4: Development Contributions and Infra 3: Improving Health and Wellbeing Draft Strategic Policy SP4 states that, where necessary, new developments will be required to provide for the necessary on-site or off-site infrastructure requirements arising from the proposal, including improvements and expansions of healthcare facilities in reference to the IDP (Supporting Paragraph 6.62). Policy Infra3 particularly concerns seeking planning obligations or CIL to mitigate impacts of new developments on health provision. As drafted Strategic Policy SP4 does not sufficiently reflect the engagement process required when assessing the likely level of healthcare infrastructure required to support the level of growth proposed by the plan. Supporting paragraph 6.64 stipulates the Council’s consideration of the ECC													Contributions Guidance SPD (2023). Whilst both documents set out the process/methodology adopted to determine the type of contributions, the required level of engagement with the Integrated Care Board (ICB) as local health commissioners should be made clear within Strategic Policy SP4, in line with Policy Infra3. For purposes of consistency across the Local Plan, we recommend the Council make clear reference to Policy Infra3 in seeking contributions for healthcare		

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								Developers' Guide to Infrastructure Contributions, and we also note the published Healthcare Facilities Developer Contributions Guidance SPD (2023). Whilst both documents set out the process/methodology adopted to determine the type of contributions, the required level of engagement with the Integrated Care Board (ICB) as local health commissioners should be made clear within Strategic Policy SP4, in line with Policy Infra3. For purposes of consistency across the Local Plan, we recommend the Council make clear reference to Policy Infra3 in seeking contributions for healthcare infrastructure, making clear reference unto the engagement required with the NHS and in particular, the ICB. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development, and should therefore be engaged with at the earliest stages possible.									infrastructure , making clear reference unto the engagement required with the NHS and in particular, the ICB. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development, and should therefore be engaged with at the earliest stages possible.		
0 3 5 3- 0 0 0 2	Organisatio n	Hya cynt h	Cabi les	NHS Prope rty		Infr a3		Draft Policy Infra3 sets out the Council's 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-								A	Draft Policy Infra3 sets out the Council's commitment to making sure that new developments consider their impacts on health and wellbeing. NHSPS	Support noted	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
								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.									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		

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																	healthcare needs, but also to addressing the wider determinants of health.		
0 3 5 3- 0 0 0 3	Organisatio n	Hya cynth	Cabi les	NHS Prope rty		Infr a1		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 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.								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 Point 4 (a), in line with our previous representatio n at early Regulation 18 stage (2024). For the avoidance of	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 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.	Y

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																	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		

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
0353-0004	Organisation	Hycynth	Cables	NHS Property		SD4		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 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.								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 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	Support noted	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	the goal of becoming the world's first net zero healthcare provider.		
0 3 5 3- 0 0 0 5	Organisatio n	Hya cynt h	Cabi les	NHS Prope rty		Had 3		Both Hadleigh Clinic and Thundersley Clinic are currently owned by NHS Property Services (NHSPS). Under draft Policies Had 3 and Thun 3A, both sites are proposed as an allocation for the delivery of 14no. and 24no. new homes, respectively. In the delivery requirements of these allocations, NHSPS welcomes the wording which requires assurance from the NHS that each respective site is first identified as being surplus to local healthcare provision requirements. NHSPS welcome the allocations in-principle and would encourage the Council's continued engagement with NHSPS in assessing the suitability of allocations Had 3 and Thun 3A for redevelopment.								A	Both Hadleigh Clinic and Thundersley Clinic are currently owned by NHS Property Services (NHSPS). Under draft Policies Had 3 and Thun 3A, both sites are proposed as an allocation for the delivery of 14no. and 24no. new homes, respectively. In the delivery requirements of these allocations, NHSPS welcomes the wording which requires assurance from the NHS that each respective site is first identified as being surplus to local healthcare	Support noted	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	provision requirements . NHSPS welcome the allocations in-principle and would encourage the Council's continued engagement with NHSPS in assessing the suitability of allocations Had 3 and Thun 3A for redevelopment.		
0 3 5 3- 0 0 0 6	Organisatio n	Hya cynth	Cabi les	NHS Prope rty		Thu n3A	Not Stat ed	Both Hadleigh Clinic and Thundersley Clinic are currently owned by NHS Property Services (NHSPS). Under draft Policies Had 3 and Thun 3A, both sites are proposed as an allocation for the delivery of 14no. and 24no. new homes, respectively. In the delivery requirements of these allocations, NHSPS welcomes the wording which requires assurance from the NHS that each respective site is first identified as being surplus to local healthcare provision requirements. NHSPS welcome the allocations in-principle and would encourage the Council's continued engagement with NHSPS in assessing the suitability of allocations Had 3 and Thun 3A for redevelopment.								A	Both Hadleigh Clinic and Thundersley Clinic are currently owned by NHS Property Services (NHSPS). Under draft Policies Had 3 and Thun 3A, both sites are proposed as an allocation for the delivery of 14no. and 24no. new homes, respectively. In the delivery requirements of these allocations, NHSPS	Support noted	N

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																	welcomes the wording which requires assurance from the NHS that each respective site is first identified as being surplus to local healthcare provision requirements . NHSPS welcome the allocations in-principle and would encourage the Council's continued engagement with NHSPS in assessing the suitability of allocations Had 3 and Thun 3A for redevelopment.		

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1 1 2 9- 0 0 0 1	Individual	Sim one	Cal dec ourt			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 2 9- 0 0 0 2	Individual	Sim one	Cal dec ourt			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 1 2 9- 0 0 0 3	Individual	Sim one	Cal dec ourt			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 9 9 7- 0 0 0 1	Individual	Lyns ey	Calv ert		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0 4 8- 0 0 0 1	Individual	Paul	Calv ert		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0 5 4- 0 0 0 1	Individual	Erin	Calv ert		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0 6 7- 0 0 0 1	Individual	Sam	Calv ert		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
1 0	Individual	Max	Calv ert		Yes	Wh ole	Yes		Yes				Not Ans	Not Ans	Not Ans		Castle Point Plan is sound	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
6 8- 0 0 0 1						Pla n							wer ed	wer ed	were d		and legally compliant,		
1 0 9 9- 0 0 0 1	Individual	Max	Calv ert		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
1 2 3 8- 0 0 0 1	Individual	Sue	Ca mer on			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is 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 site selection strategy is biased and predetermine d towards a	Housing Supply – Government Housing Target and Standard method 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	Y - See Schedule of Mods, in relation to Canvey, Infrastruc ture and Sustaina ble Develop ment (includin g SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						"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	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. <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,	

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																		Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 2 3 8- 0 0 0 2	Individual	Sue	Ca mer on			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 2 3 8- 0 0 0 3	Individual	Sue	Ca mer on			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 2 1 2- 0 0 0 1	Individual	Ge mma	Ca mpa n		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 [REDACTED] and love it here. However the traffic has become a nightmare even on a good day. How you expect to build 3000 new homes which will bring double the amount of cars I do not understand. I am already considering moving off the island as it has become a joke. I work [REDACTED] and the journey takes 30mins however in the morning I have to allow 1.5hrs to get to work. This will increase even more with extra	Not Sta ted				Not Stat ed		No		Traffic will not cope with the level of housing proposed on Canvey. Also no capacity to cope in schools, doctors	Highways Impacts: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Infrastructure matters (including education and health services) re covered by policies INFRA1-6 and	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								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.										the supporting Infrastructure Delivery Plan (IDP).	
0075-0001	Individual	Olive	Campe		Not Stated	Had 4	Not Stated	Dear Castle Point Council I object to the planned housing in this plan, it's a nightmare driving past the said area due to parked cars even when the school is closed. At times the traffic is stationary trying to get through, a special danger for emergency services.	Not Stated	Not stated	It's just too many houses etc, even if sizes of boxes it still means more cars per house to park, two space allocation per property is not enough.	I'm sure that great open space would benefit the attached school so much more, give the local children an open space to actually run and play instead of taking spaces/views away. How the local people will appreciate you then. Give something back instead of taking.	Not Stated		No		I object to the planned housing in this plan, it's a nightmare driving past the said area due to parked cars even when the school is closed. At times the traffic is stationary trying to get through, a special danger for emergency services. It's just too many houses etc, even if sizes of boxes it still means more cars per house to park, two space allocation per property is not enough. I'm sure that great open space would benefit the attached	Comments noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	school so much more, give the local children an open space to actually run and play instead of taking spaces/views away.		
0 8 1 0- 0 0 0 1	Individual	Nic ola	Can non		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 9 7 6- 0 0 0 1	Individual	Ian	Can non		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 9 7 8- 0 0 0 1	Individual	Lew is	Can non		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 1 7 9- 0 0 0 1	Individual	Patr icia	Can twel l			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	<u>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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 7 9- 0 0 0 2	Individual	Patr icia	Can twel l			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid ence sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 1 7 9- 0 0 0 3	Individual	Patr icia	Can twel l			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 1 9 3- 0 0 0 1	Individual	Davi d	Can ty			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						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	this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 9 3-	Individual	Davi d	Can ty			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 0 2								Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1 1 9 3- 0 0 0 3	Individual	Davi d	Can ty			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 6 6 7- 0 0 0 1	Individual	Jam es	Cap ewe ll		Yes	HA D4	Yes		No	Justified	114 dwellings is not in keeping with the existing character of Scrub Lane. The existing character is single or double story detached dwellings. Scrub Lane can't cope with more cars / traffic 'Complex needs' could be an issue being near a school 'Complex needs' could be an issue being near a park As an example the Mews		No	Not Ans wer ed	Not Ans were d	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Location of site close to a school and play park	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											development has itself caused a bottleneck so 114 extra cars will have to be accommodated on the land too. The number of dwellings proposed is substantially higher and on a smaller block of land than any previous rejected local plan.							have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Location The council has a duty to provide homes for all and supported living dwellings are considered appropriate in this location. More information can be found in the Equality Impact Assessment.	
1 3 6 7- 0 0 0 1	Individual	Patr icia	Car esw ell			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding,		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											but the Hou5 policy should allow further development which improves the overall site environment for the local residents.								
1 3 6 7- 0 0 0 2	Individual	Patr icia	Car esw ell			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.							progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle	Point Strategic Flood Risk Assessment (SFRA).

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																		Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		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	

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																		capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk	

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																		covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 6 7- 0 0 0 3	Individual	Patr icia	Car esw ell			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 9 3 5- 0 0	Individual	Ian	Care y		Yes	Wh ole Pla n	Yes		Yes	Consistent with national policy			No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
01																			
0900001	Individual	Arne	Carlson		Yes	HAD4	Yes		Yes			With regard to HAD4, this land cannot support the proposed 114 homes. Ideally I would prefer this to be developed as playing fields but if it has to be developed, it should be in keeping with the remainder of Scrub Lane. There are only 10/11 houses opposite this site and 2 down each side. A policy of in-keeping should consider no more than 30 homes. How 114 homes will fit with adequate parking of at least 2 spaces is incomprehensible. The development of Scrub Lane Mews shows how a cramped design has negatively impacted the area and 114 homes would be a huge mistake and a quota of 30 homes would be more reasonable. The reason for this is as follows: -It will be sympathetic to the existing homes layout -Scrub Lane traffic and parking is getting worse each week. The building of Scrub Lane Mews has caused so many parking issues which ECC will do nothing about despite issues being raised around dangers to school children, road rage and the fact that Scrub Lane is often used as a cut through when the A13 is obstructed and on many occasions, you cannot move down the road due to congestion -The local doctor and dentist surgeries cannot cope with the current population of this area -The utilities are always failing particularly the water pipework	No	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Air quality Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.	N

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												-It will be safer for pupils attending both of the Hadleigh schools -Our own road - Woodland Close, has over 17 'track it ' issues with ECC which have not been attended to and to neglect existing residents over new development is a real failing of Essex overall, irrespective of what falls under ECC or CPBC. - There will be significant increase in levels of pollution both with the building work and the additional homes. - 30 homes would offer a greater chance of green space and planting as opposed to the 'concrete over ' method which is counter to the vision and objectives and the information on page 24 /6.27						details. Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions from major roads, notably 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	

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																		monitoring points across the Borough suggest that air quality is improving.	
0 9 0 3- 0 0 0 1	Individual	Nic ola	Carl sen		Yes	HA D4	Yes		Yes			With regard to HAD4, this land cannot support the proposed 114 homes. Ideally I would prefer this to be developed as playing fields but if it has to be developed, it should be in keeping with the remainder of Scrub Lane. There are only 10/11 houses opposite this site and 2 down each side. A policy of in-keeping should consider no more than 30 homes. How 114 homes will fit with adequate parking of at least 2 spaces is incomprehensible. The development of Scrub Lane Mews shows how a cramped design has negatively impacted the area and 114 homes would be a huge mistake and a quota of 30 homes would be more reasonable. The reason for this is as follows: -It will be sympathetic to the existing homes layout -Scrub Lane traffic and parking is getting worse each week. The building of Scrub Lane Mews has caused so many parking issues	Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Air quality Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required	
												which ECC will do nothing about despite issues being raised around dangers to school children, road rage and the fact that Scrub Lane is often used as a cut through when the A13 is obstructed and on many occasions, you cannot move down the road due to congestion -The local doctor and dentist surgeries cannot cope with the current population of this area -The utilities are always failing particularly the water pipework -It will be safer for pupils attending both of the Hadleigh schools -Our own road - Woodland Close, has over 17 'track it ' issues with ECC which have not been attended to and to neglect existing residents over new development is a real failing of Essex overall, irrespective of what falls under ECC or CPBC. - There will be significant increase in levels of pollution both with the building work and the additional homes. - 30 homes would offer a greater chance of green space and planting as opposed to the 'concrete over ' method which is counter to the vision and objectives and the information on page 24 /6.27 -the proposal to add cycle lanes will be very risky given the existing parking hazards and said congestion above. Parking needs to banned on this road irrespective of any new development							Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road	

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																		traffic emissions from major roads, notably the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMAS). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving.	
0 9 0 3- 0 0 0 2	Individual	Nic ola	Carl sen		Yes	HA D3	Yes		Yes			I do not believe it is justified to develop the Hadleigh Clinic site and replace with 14 homes. I don't understand how this is deemed surplus to requirements when it sometimes take 2/3 weeks to obtain an appointment. What is the alternative nearby provision as there is nowhere we can walk to and would have to drive to either Benfleet or Canvey which is not possible for many residents.	No	Not Ans wer ed		A	Objecting to HAD3 due to loss of NHS building	Policy HAD3 and Infra1 both safeguard the replacement of community facilities by ensuring that an alternative is provided and that the NHS building is surplus to requirement. Should the NHS decide that they need this building the proposed site would not be built upon.	N
0 9 0 3- 0 0	Individual	Nic ola	Carl sen		Yes	HA D4	Yes		Yes			page 66 - section 10.9 states that new cycle infrastructure will be added to New Road/Scrub Land and Daws Heath road. I would really welcome this but current levels of parking are too	No	Not Ans wer ed		A	Welcomes cycle infrastructure to policy HAD4 but requires	Parking restrictions are controlled by the local highways authority which	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
03												dangerous to include this. The ability to park especially in Scrub Lane should be removed at certain times of the day.					parking on scrub lane to be banned	is Essex County Council.	
0903-0004	Individual	Nicola	Carlson		Yes	For ew ord	Not Ans wer ed	I would also like to add that the CPBC have not made this easy for residents to respond to and I know many people have not responded as they cannot easily work out or have the time to navigate the ability to respond	No t An sw ere d				Not Ans wer ed	Not Ans wer ed		A	Finding the consultation difficult to respond to	Castle Point has tried to make the consultation as accessible as possible while still meeting legal requirements.	N
0904-0001	Individual	Paul	Carlson		Yes	HA D4	Yes		Yes			With regard to HAD4, this land cannot support the proposed 114 homes. Ideally I would prefer this to be developed as playing fields but if it has to be developed, it should be in keeping with the remainder of Scrub Lane. There are only 10/11 houses opposite this site and 2 down each side. A policy of in-keeping should consider no more than 30 homes. How 114 homes will fit with adequate parking of at least 2 spaces is incomprehensible. The development of Scrub Lane Mews shows how a cramped design has negatively impacted the area and 114 homes would be a huge mistake and a quota of 30 homes would be more reasonable. The reason for this is as follows: -It will be sympathetic to the existing homes layout -Scrub Lane traffic and parking is getting worse each week. The building of Scrub Lane Mews has caused so many parking issues which ECC will do nothing about despite issues being raised around dangers to school	No	Not Ans wer ed	Not Ans were d	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Air quality	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
												children, road rage and the fact that Scrub Lane is often used as a cut through when the A13 is obstructed and on many occasions, you cannot move down the road due to congestion -The local doctor and dentist surgeries cannot cope with the current population of this area -The utilities are always failing particularly the water pipework -It will be safer for pupils attending both of the Hadleigh schools -Our own road - Woodland Close, has over 17 'track it ' issues with ECC which have not been attended to and to neglect existing residents over new development is a real failing of Essex overall, irrespective of what falls under ECC or CPBC. - There will be significant increase in levels of pollution both with the building work and the additional homes. - 30 homes would offer a greater chance of green space and planting as opposed to the 'concrete over ' method which is counter to the vision and objectives and the information on page 24 /6.27 -the proposal to add cycle lanes will be very risky given the existing parking hazards and said congestion above. Parking needs to banned on this road irrespective of any new development						Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions from major roads,	

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																		notably the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMAs). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving.	
0 9 0 4- 0 0 0 2	Individual	Paul	Carl sen		Yes	HA D3	Yes		Yes			I do not believe it is justified to develop the Hadleigh Clinic site and replace with 14 homes. I don't understand how this is deemed surplus to requirements when it sometimes take 2/3 weeks to obtain an appointment. What is the alternative nearby provision as there is nowhere we can walk to and would have to drive to either Benfleet or Canvey which is not possible for many residents.	No	Not Ans wer ed		A	Objecting to HAD3 due to loss of NHS building	Policy HAD3 and Infra1 both safeguard the replacement of community facilities by ensuring that an alternative is provided and that the NHS building is surplus to requirement. Should the NHS decide that they need this building the proposed site would not be built upon.	N
0 9 0 4- 0 0 0 3	Individual	Paul	Carl sen		Yes	HA D4	Yes		Yes			page 66 - section 10.9 states that new cycle infrastructure will be added to New Road/Scrub Land and Daws Heath road. I would really welcome this but current levels of parking are too dangerous to include this. The ability to park especially in Scrub Lane should be removed at	No	Not Ans wer ed		A	Welcomes cycle infrastructure to policy HAD4 but requires parking on scrub lane to be banned	Parking restrictions are controlled by the local highways authority which is Essex County Council.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und ?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
												certain times of the day. Furthermore, the New Road junction to the A13 is awful and the congestion in New road to access the A13 is often impossible to use. This is exacerbated by Morrisons only having one exit route from the store. An exit onto the A13 would help local traffic to gain access to the A13 with greater ease.							
0 9 0 4- 0 0 0 4	Individual	Paul	Carl sen		Yes	For ew ord	Not Ans wer ed		No t An sw ere d			I would also like to add that the CPBC have not made this easy for residents to respond to and I know many people have not responded as they cannot easily work out or have the time to navigate the ability to respond	Not Ans wer ed	Not Ans wer ed		A	Finding the consultation difficult to respond to	Castle Point has tried to make the consultation as accessible as possible while still meeting legal requirements.	N
1 1 7 4- 0 0 0 1	Individual	Lind a	Carr oll			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 site selection strategy is biased and	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is 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	<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.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						guidelines. It is not justified, the site selection strategy is biased and predetermine d 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	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. <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	

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																	, the proposed 3316 urban homes for Canvey is not resident led	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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> 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	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1 1 7 4- 0 0 0 2	Individual	Lind a	Carr oll			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 1 7 4- 0 0 0 3	Individual	Lind a	Carr oll			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 1 7 5- 0 0 0 1	Individual	And y	Carr oll			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 7 5- 0 0 0 2	Individual	And y	Carr oll			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid ence sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
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1 2 1 5- 0 0 0 1	Individual	Ken neth	Cart er			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						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	this is a realistic housing delivery Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 1 5-	Individual	Ken neth	Cart er			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

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0 0 0 2								Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1 2 1 5- 0 0 0 3	Individual	Ken neth	Cart er			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 2 1 6- 0 0 0 1	Individual	Dor othy	Cart er			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 site selection strategy is biased and predetermined	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						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	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. <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	

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																	proposed 3316 urban homes for Canvey is not resident led	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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> 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.	

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																		Canvey SuDS options have been considered through the SFRA.	
1 2 1 6- 0 0 0 2	Individual	Dor othy	Cart er			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 2 1 6- 0 0 0 3	Individual	Dor othy	Cart er			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 9 9 8-	Individual	Kevi n	Cas ey		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 0 0 1																			
1 3 5 6- 0 0 0 1	Individual	Julie	Cas hma n			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 3 5 6- 0 0 0 2	Individual	Julie	Cas hma n			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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																		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.	

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																		North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of	

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																		the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us	

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																		would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to	

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																		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.	
1 3 5 6- 0 0 0 3	Individual	Julie	Cas hma n			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 6 3 1- 0 0 0 1	Individual	Sus an	cass idy		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 7 7 2- 0 0 0 1	Individual	Kar en	Cast le		Yes	SP3	No		No	Justified, Consistent with national policy	Does meet the target and has excluded viable alternative sites	Look at alternative brown and grey belt sites especially NW thundersley	No	Not Ans wer ed	Not Ans were d		Doesnt meet housing targets North West Thundersley	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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																		provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West	

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																		Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	
0 9 3 3- 0 0 0 1	Individual	Jen nie	Cavi ll		Yes	SP3	Yes		No	Effective, Justified	I am concerned that with the traffic and parking already under strain, we can not support this amount of new housing. We also have a child care issue in the local area, where will any new children be going to school ? Have the local nursery's/schools been geared up to help support parents ? Please speak to local nurseries who have closed waiting lists ?	Consideration into the above points.	No	Not Ans wer ed	Not Ans were d		Infrastructure	Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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1 2 2 7- 0 0 0 1	Individual	Terr y	Caw s			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 2 7- 0 0 0 2	Individual	Terr y	Caw s			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 2 2 7- 0 0 0 3	Individual	Terr y	Caw s			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 0 3 8- 0 0 0 1	Individual	Em ma	Ceni zo- Sha msh oum		Yes	SP3	Yes		Yes	Effective	As long as brown belt is being reused, not greenbelt.	Our are cannot take a large increase in housing, people or traffic due to lack of infrastructure: schools, doctors, dentists, hospitals, and the traffic is horrendous already creating pollution in our environment. We also already have a lot of flooding, due to too much housing.	No	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant, as long as no green belt is used. Has some worries around impacts of too large a housing growth.	Support Noted	N

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0 8 9 6- 0 0 0 1	Individual	Jane t	Cha mbe rlain		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, and Hadleigh at 305. Total housing target of 11,000.	No	Not Ans wer ed	Not Ans were d		No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use							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.	

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											grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the	

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																		requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were	

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																		promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is	

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																		safeguarded by policy HAD6	

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0 5 5 5 - 0 0 0 1	Individual	Car ol	Cha mbe rs		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 5 5 - 0 0 0 2	Individual	Car ol	Cha mbe rs		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 5 5 - 0 0 0 3	Individual	Car ol	Cha mbe rs		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	

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0 5 7 1 - 0 0 0 1	Individual	Ber nard	Cha mbe rs		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 7 1 - 0 0 0 2	Individual	Ber nard	Cha mbe rs		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 7 1 - 0 0 0 3	Individual	Ber nard	Cha mbe rs		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
1 0 3 7- 0 0 0 1	Individual	Mich ell e	Cha mbe rs		Yes	SP3	No	Oak tree felling is an offence. The infrastructure won't take any more building of houses. Don't take away our green belt areas.	No	Positively prepared, Effective, Justified	The tree roots will cause a detrimental affect to building with subsidance. The drainage system in the area can't take the strain. It is not justified to destroy natural creature habitats	Scrap the plans to build houses	Yes	Not Ans wer ed	Not Ans were d		No building in the green belt felling oak trees is illegal Tree roots will cause subsidance strain on drainage system no more houses	Comments noted The plan does not plan for the removal of oak trees Any development proposed would be	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
1058-0001	Individual	John	Champion		Yes	SP3	No	Like most residents, (& even Councillors!), I am not legal expert on Planning Laws. However, my understanding from National Government comments and media, it appears a legal requirement to try and meet Housing targets under NPPF. The Plan only meets just over 50% of target and I feel that Inspector/Whitehall or Ministry will look no further in assessing it. In my view the Central Govt target is also 'unsound' and unrealistic. Castle Point is not only short on own infrastructure (Roads, Health in particular) but sits on the 2 major exits routes from City of Southend (A13/A127) to the East. Their development targets, even in a reduced form are unsustainable in additional transport volumes that would pass through Castle Point on road and rail. I support the Council view of concentrating on 'urban development' and retention of Green Belt sites, in particular, Salvation Army farmland, which also provides a buffer to City of Southend. Also the pocket behind Kiln Road Council Offices and unmade area of The Chase, which creates a green safe corridor and protects wildlife. I do not agree there is surplus parking in Hadleigh Town Centre, and think removal of	No	Effective, Consistent with national policy	Only meets c.50% of National targets for housing needs under NPPF, although that figure is totally unrealistic. See 2b above. The current rate of building new property is far below the rate proposed in the Plan already, and the increase to NPPF rate is simply unrealistic. Apart from land availability, there are not resources including labour) available to achieve it. There is a heavy proportion of the proposed housing need placed on Canvey Island. Given the current issues with access to/from the Island, as well as flood risk, this does not seem appropriate. The planned building is heavily back loaded into years 11-17.	A robust explanation specifically detailing why the NPPF target should be significantly reduced. I support the principle of prioritising development in urban areas / brownfield sites and retaining as much existing green belt areas as possible, although some of these have already been lost in absence of a plan eg Land north of The Chase. Owners in the area may disagree, but I think there should be detailed study of potential development of area known as NW Thundersley / Blinking Owl. There are already some buildings there and it provides opportunity for access to major trunk roads in District without impacting already gridlocked towns and villages. I consider this has potential to meet significant part of housing target and leave existing Green Belt untouched and reduce reliance on Canvey Island.	No	Not Answered	Not Answered	A	Not meeting housing target North West Thundersley Support the councils urban first approach Objects to removal of car parks in Hadleigh Questions local bus rerouting/frequency	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	N

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								charges or at least 'free periods' would help bring customers to local shops. The possible loss of car parks would exacebate this problem. Depsite many plans etc, nothing has still been done with Hadleigh 'Island' and has been missed opportunity by several administrations. Reading the plan, I note several comments with regard to increased usage of public transport ie buses and the wish to increase frequency and to change some routes. Moving Route 28 to Church Road would leave Western Bnenfleet without a bus covering A13 towards Southend, although re-instatement of previous route 21 through Thndersley village would help many, particularly with access to Southend Hospital. However, it cannot be ignored that the frequency on these routes has been reduced and routes curtailed by First Bus. It would seem unlikely that they will reinstate and increase them!												provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West	

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																		Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Support to the urban first approach noted. Objection to the removal of public car parks noted Decisions regarding ammendments to bus routes/frequency are a matter for planning application stage	

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1 1 7 0- 0 0 0 1	Individual	Der ek	Cha mpi on			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 7 0- 0 0 0 2	Individual	Der ek	Cha mpi on			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 1 7 0- 0 0 0 3	Individual	Derek	Champion			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 8 9 7- 0 0 0 1	Individual	Lisa	Chandler		Yes	Whole Plan	No	Don't want more houses built unless they put in another road	No				No	Not Answered	Not Answered		Third Road onto Canvey	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access	N

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																		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.	
0 8 9 7- 0 0 0 2	Individual	Lisa	Chandle r		Yes	Wh ole Pla n	No		No	Consistent with national policy		No more houses	No	Not Ans wer ed			No more houses	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year	N

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																		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 from the Local Housing	

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																		Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.	
1 2 4 3- 0 0 0 1	Individual	Mr K	Chandle r			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						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	Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 4 3- 0 0	Individual	Mr K	Cha ndle r			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported									Policy HOU5 should make provision for improved site environment	Comments noted. Policy HOU5 does not restrict improvement to	N

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0 2								on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									for the local residents	the sites environment	
1 2 4 3- 0 0 0 3	Individual	Mr K	Cha ndle r			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 2 4 4- 0 0 0 1	Individual	Den	Cha ndle r			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						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	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. <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	

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																	homes for Canvey is not resident led	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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		been considered through the SFRA.	
1 2 4 4- 0 0 0 2	Individual	Den	Chandler			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 2 4 4- 0 0 0 3	Individual	Den	Chandler			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0 3 1 9- 0 0 0 1	Agent	Jam es	Cha pma n	Disco very Land and Planni ng		SP3	No	This representation addresses the soundness of the Castle Point Local Plan (Regulation 19). While the Council has made progress towards plan-making, the Publication Draft is unsound as it significantly under-provides for housing need, relies on unrealistic assumptions in its trajectory, overstates supply, and fails to make adequate provision for affordable housing. The Council has also not adequately explored reasonable alternatives such as densification, redevelopment of low-density estates, and managed garden land capacity. Key issues: - Housing requirement is set at 6,196 dwellings (364 dpa) compared with a local housing need of 11,662 dwellings (686 dpa), leaving a gap of 5,466 dwellings. - The trajectory is backloaded: 1,045 homes in years 1–5; 1,268 in years 6–10; and 3,883 in years 11–17. Many sites only deliver from 2028/29 or later. - Over-counting: Council includes dwellings scheduled beyond the plan period and holiday home replacements (Thorney Bay) in its supply. - Extant permissions are counted without any non-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				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.	Noted	N

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								Affordable Housing dependent on one single site (C4) not delivering until late in the plan period. - Council has not properly assessed the redevelopment potential of low-density Council-owned estates or the contribution from garden/backland redevelopment. The plan therefore fails the NPPF tests of being positively prepared, justified, effective, and consistent with national policy. 1. Housing Requirement Shortfall Problem: The Plan sets a provision of 6,196 dwellings (364 dpa), while the standard method (Dec 2024) requires approximately 686 dpa (11,662 dwellings), leaving a shortfall of 5,466 dwellings. This under-provision is contrary to NPPF paragraph 61. Why Unsound: Not positively prepared, not justified, not consistent with national policy.											11–17. Many sites only deliver from 2028/29 or later. - Extant permissions are counted without any non-delivery discount (despite evidence that 10% of permissions lapse). The plan therefore fails the NPPF tests of being positively prepared, justified, effective, and consistent with national policy.		
0319-0002	Agent	Jam es	Cha pma n	Disco very Land and Planni ng		SP3	Not Stat ed	Problem: The Council adopts a stepped trajectory (1,045 / 1,268 / 3,883) which backloads delivery to later years. The SLAA shows all allocations do not start until 2028/29 or later. The Council also counts dwellings beyond the plan period (200 units each from C1 and Had1 scheduled to be delivered after the plan period are included in the 6,196 calculation) and holiday home replacements (Thorney Bay). Extant permissions are counted with	No	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	Noted	N		

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								no discount for non-implementation.									plan period and holiday home replacements (Thorney Bay) in its supply.		
0 3 1 9- 0 0 0 3	Agent	Jam es	Cha pma n	Disco very Land and Planni ng		HO U2		3. Affordable Housing Delivery Problem: The LHNA (June 2025) identifies a need for 1,458 affordable homes (86 p.a.). Policy H2 requires Affordable Housing to be calculated at 10% on Brownfield above commercial, 20% on Brownfield and 30% on Greenfield on allocations, which equates to 954 units across all allocated sites. Site C4 provides 600 of these dwellings (62% of the total projected delivery, with this site not scheduled to deliver any units in the first 10 years of the plan period. If all allocated sites deliver their affordable housing requirement in line with the trajectory outlined in the Housing Topic Paper August 2025, then delivery shall be 68 units in the first 5 year period; 241 in yrs 6-10; and, 644 units in the last seven years of the plan period. This provides just 14 units per annum in the first five years, rising to 48 units in yrs 6-10 and then 92 units in yrs 11-17. Historic Affordable Housing delivery (2011–24) was just 195 dwellings (15 p.a.), well below need.				Suggested Modifications: - Increase AH requirements where viable. - Increase number of allocated sites. - Accelerate delivery on small Council-owned or brownfield sites. - Publish an AH delivery plan with monitoring triggers if delivery falls short. Illustrative Affordable Housing Delivery vs Need: Category Units Timing Issues Identified Need (LHNA, 2025) 1,458 86 per annum required Expected Supply from Allocations (Policy H2) 954 Majority dependent on Site C4 Shortfall 504 Frontloaded delivery not secured Current projection shows the delivery of 309 units (68 + 241 = 309) in the first 10 years against a requirement of 860 (86 x 10 = 860). This means the authority is planning for a shortfall of 551 units in the first 10 years of the plan.			Yes	A	- Affordable Housing: The LHNA (June 2025) identifies a need for 1,458 AH units (86 p.a.), but allocations are expected to deliver only 954, with most Affordable Housing dependent on one single site (C4) not delivering until late in the plan period.	Noted	N
0 3 1 9- 0 0 0	Agent	Jam es	Cha pma n	Disco very Land and Planni ng		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.	No	Not Stated		Suggested Modifications: - Undertake and publish a full audit of Council-owned residential land. - Introduce policies supporting sensitive densification and estate			Yes	A	The Council has not audited its own residential land holdings	Where appropriate, this would have fallen into the 'Additional land identified by the	N

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0 4								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 requirement for justification.				renewal. - Carry out a Garden Land Capacity Study and adopt criteria-based policies to manage appropriate redevelopment. Requested Modifications (a) Restate the supply tables, removing post-period units. (b) Replace the stepped trajectory with an annual, site-by-site profile including non-implementation discounts. (c) Remove holiday replacement units from the deliverable tally unless robust evidence is provided. (d) Publish a clear Affordable Housing delivery plan with monitoring triggers. (e) Audit Council-owned residential estates for early densification and include them in the trajectory. (f) Commission and publish a Garden Land Capacity Study to inform policy.					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 requirement for justification.	Council 'category referred to in the Housing Topic Paper.	

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0 3 8 1 - 0 0 0 1	Individual	Step hen	Cha ppel l		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.					Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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											support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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																		again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North	

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																		West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the	

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																		natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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																		site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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1 1 9 0- 0 0 1	Individual	Car ol	Cha rles			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	<u>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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 9 0- 0 0 0 2	Individual	Car ol	Cha rles			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Para No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
1190003	Individual	Carol	Charles			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0464-001	Individual	John	Cheesman		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1133-001	Individual	Ken	Childs			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 site selection strategy is biased and predetermined towards a "no	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.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						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	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. <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	

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																	3316 urban homes for Canvey is not resident led	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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		options have been considered through the SFRA.	
1 1 3 3- 0 0 0 2	Individual	Ken	Childs			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 1 3 3- 0 0 0 3	Individual	Ken	Childs			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1 1 3 4- 0 0 0 1	Individual	Jan	Childs			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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1 1 3 4- 0 0 0 2	Individual	Jan	Childs			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 1 3 4- 0 0 0 3	Individual	Jan	Childs			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 2 0 0- 0 0 0 1	Individual	Edward	Childs			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						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	this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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1 2 0 0-	Individual	Edw ard	Chil ds			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

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0 0 0 2								Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1 2 0 0- 0 0 0 3	Individual	Edw ard	Chil ds			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 6 2 3- 0 0 0 1	Individual	Phili p	Chil vers		Yes	SP3	No	3000+ houses on Canvey just isn't sustainable, the infrastructure isn't there and it is the biggest flood plane in the area	No	Positively prepared, Effective, Justified, Consistent with national policy	You can't dump all the house on one small Island it isn't feasible	Not to build 3000 houses on Canvey and to find a large empty brown site with good transport links and build a brand new mini town	No	Not Ans wer ed		A	Too many houses on Canvey Build a new town with good transport links instead	Comments noted All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	N
0 9 8 9- 0 0 0 1	Individual	Dily s	Chis hol m		Yes	Wh ole Pla n	No		No			This is legal jargon to confuse the residents of Castle Point. Everyone I speak to about extra houses being built says how can we sustain the massive amount of traffic on our narrow roads, the doctors surgeries will not be able to cope and new schools will have to built. This pleasant area where we live will be spoilt. I look at the congestion on the main roads and realise this not viable for future healthy living.	No	Not Ans wer ed	Not Ans were d		Traffic Infrastructure	Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the	N

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																		Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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1 0 9 1- 0 0 0 1	Individual	Tess a	Chu rch		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 0 4 5- 0 0 0 1	Individual	Pete r	Clar k		Yes	Wh ole Pla n	Yes	Dear Sir/Madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stat ed		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0 0 6 4- 0 0 0 1	Individual	Julie t	Clar k		Yes	Wh ole Pla n	Yes	Dear Sir/ Madam , I support the Castle Point plan regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. . I consider the draft plan to be sound .	Yes				Not Stat ed		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0 4 2 9 - 0 0 0 1	Individual	Ellis	Clar k		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 4 3 0 - 0 0 0 1	Individual	Imo gen	Clar k		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 5 8 4 - 0 0 0 1	Individual	Mon ica	Clar k		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 8 4 - 0 0 0 2	Individual	Mon ica	Clar k		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 8 4 - 0 0 0 3	Individual	Mon ica	Clar k		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
1 3 7 4- 0 0 0 1	Individual	Mon ica	Clar k			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											the overall site environment for the local residents.								
1 3 7 4- 0 0 0 2	Individual	Mon ica	Clar k			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	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm

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											proposed 3316 urban homes for Canvey is not resident led.							5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further	ent (SFRA).

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																		information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt	

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																		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 highway network in and around Castle Point, Evidence	

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																		of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk	

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																		Assessment (SFRA), 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.	
1 3 7 4- 0 0 0 3	Individual	Mon ica	Clar k			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0 5 1 2 - 0 0 0 1	Individual	Ray	Clar ke		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0512-0002	Individual	Ray	Clarke		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 1 2 - 0 0 0 3	Individual	Ray	Clar ke		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations . Further details of this is included in the reg 18 consultation statement	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							and reg 22 consultation statement.	
0 6 4 5- 0 0 0 1	Individual	Stuart	Clarke		Yes	C5	Yes		No	Effective	I fail to understand how more housing can be put on Canvey with the current levels of access and egress. If one of the major roads on Canvey has an accident then the island is gridlocked. If you want to go off the island at the weekend, don't	Improved access and egress written into the plan rather than comments on studying it.	No	Not Answered	Not Answered	A	Third access required onto Canvey Island.	Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a	N

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											bother between 10:30 and 14:30, stationary traffic and grid lock. If you want to go to work off the island you need to be gone before 7 am and back before 14:00 or, you've guessed it, gridlock. .The infrastructure is not suitable for additional loading. There has been wishy washy discussion for more years than I can remember about 3rd roads and improved access and nothing is done. You rightly point out the COMAH sites and with these access should be a priority, not another study												strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex 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	

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																		the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
1 0 6 5- 0 0 0 1	Individual	Terr y	Clar ke		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point	Add North West Thundersley site, reduce the urban housing target by half,	No	Not Ans wer ed	Not Ans were d	A	North West Thundersley No five year housing land supply Doesn't meet housing target Green/Grey Belt	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or	N

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											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.							in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position	

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																		is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new	

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																		housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it	

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																		is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons,	

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																		when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose.	

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																		Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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1 0 6 5- 0 0 0 2	Not Answered	Terr y	Clar ke		Not Answ ered	HA D3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The 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	Add North West Thundersley site, reduce the urban housing target by half, remove the Had3 Hadleigh Clinic site from the local plan	No	Not Ans wer ed		A	Objecting to HAD3 because: Accessible clinic should not be removed	Policy HAD3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N

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											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 Had3 Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 14 homes. The Hadleigh Clinic is used by many local elderly residents from Hadleigh, who have no transport available, who walk to these									

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											clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provided the same service elsewhere in the Hadleigh area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to the Infra3 Policy, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a								

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											deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.								
1 0 6 5- 0 0 0 3	Not Answered	Terry	Clarke		Not Answered	HAD4	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.	Add North West Thundersley site, reduce the urban housing target by half, revise Scrub Lane development to 20 homes.	No	Not Answered		A	Objecting to HAD4 because: density	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details	N

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											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 Had4 Policy is								

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

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											plan said protect the Greenbelt and use the Brownfield sites, but the resident's responses did not say to destroy those areas like Scrub Lane with over development. This policy is the perfect reason why you need to add the North West Thundersley site as an alternative site, that gives us the housing numbers required, driven by an infrastructure first policy and we can reduce the over development of our urban sites across the borough.								
1 0 6 5- 0 0 0 4	Not Answered	Terr y	Clar ke		Not Answ ered	TH UN 3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	Add North West Thundersley site, reduce the urban housing target by half, remove the Thun3A Thundersley Clinic site from the local plan.	No	Not Ans wer ed		A	Objecting to THUN3 because: Accessible clinic should not be removed	Policy THUN3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N

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											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								

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											West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. The Thun3A Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 24 homes. The Thundersley Clinic is used by many local elderly residents from Thundersley, who have no transport available, who walk to these clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provided the same service elsewhere in the Thundersley area,								

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											and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its over development urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to the Infra3 Policy, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.								

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106-0001	Individual	Sheila	Clarke		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The 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	Add North West Thundersley site, reduce the urban housing target by half,	No	Not Answered	Not Answered		North West Thundersley No five year housing land supply Doesn't meet housing target Green/Grey Belt	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											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.							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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																		again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North	

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																		West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the	

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																		natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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																		site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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1 0 6 6- 0 0 0 2	Not Answered	Shei la	Clar ke		Not Answ ered	HA D3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The 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	Add North West Thundersley site, reduce the urban housing target by half, remove the Had3 Hadleigh Clinic site from the local plan.	No	Not Ans wer ed			Objecting to HAD3 because: Accessible clinic should not be removed	Policy HAD3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N

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											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 Had3 Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 14 homes. The Hadleigh Clinic is used by many local elderly residents from Hadleigh, who have no transport available, who walk to these								

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											clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provided the same service elsewhere in the Hadleigh area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to the Infra3 Policy, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a								

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											deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.								
1 0 6 6- 0 0 0 3	Not Answered	Sheila	Clarke		Not Answered	HAD4	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.	Add North West Thundersley site, reduce the urban housing target by half, revise Scrub Lane development to 20 homes.	No	Not Answered			Objecting to HAD4 because: density	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details	N

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											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 Had4 Policy is									

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

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											resident led local plan said protect the Greenbelt and use the Brownfield sites, but the resident's responses did not say to destroy those areas like Scrub Lane with over development. This policy is the perfect reason why you need to add the North West Thundersley site as an alternative site, that gives us the housing numbers required, driven by an infrastructure first policy and we can reduce the over development of our urban sites across the borough.								
1 0 6 6- 0 0 0 4	Not Answered	Shei la	Clar ke		Not Answ ered	TH UN 3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build	Add North West Thundersley site, reduce the urban housing target by half, remove the Thun3A Thundersley Clinic site from the local plan.	No	Not Ans wer ed			Objecting to THUN3 because: Accessible clinic should not be removed	Policy THUN3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N

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											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.								

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											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 Thun3A Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 24 homes. The Thundersley Clinic is used by many local elderly residents from Thundersley, who have no transport available, who walk to these clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provided the same service elsewhere in the								

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											Thundersley area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its over development urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to the Infra3 Policy, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.								
1 3 3 3- 0	Individual	S	Clar ke			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park		No				Policy HOU5 should make provision for improved site environment	Comments noted. Policy HOU5 does not restrict improvement to	N

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0 0 1											Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.						for the local residents	the sites environment	
1 3 3- 0 0 0 2	Individual	S	Clar ke			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS

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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.							is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used	Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4)	

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																		outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the	

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																		role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those	

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																		reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 3 3- 0 0 0 3	Individual	S	Clar ke			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 2 5 5- 0 0 0 1	Individual	Lind a	Clay don			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 5 5- 0 0 0 2	Individual	Linda	Claydon			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 2 5 5- 0 0 0 3	Individual	Lind a	Clay don			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 2 3 9- 0 0 0 1	Individual	Stev e	Cliff ord			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						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	this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 3 9-	Individual	Stev e	Cliff ord			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 0 2								Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1 2 3 9- 0 0 0 3	Individual	Stev e	Cliff ord			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 4 2 4- 0 0 0 1	Individual	Shei la	Cliff ord		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	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	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.					Failed to consider strategic alternatives like North West Thundersley and it has 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. It is not justified, the	<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)	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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 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. The following modifications	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> 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	

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	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.	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. <u>Flooding and infrastructure</u> 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.	
142	Individual	Sheila	Clifford		Yes	C4					The number of Canvey West homes puts						The number of Canvey West homes	Needs of emergency services	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
4- 0 0 0 2											residents in the East at risk with emergency evacuation procedures						puts residents in the East at risk with emergency evacuation procedures	considered in the supporting Infrastructure Delivery Plan (IDP).	
1 4 2 4- 0 0 0 3	Individual	Sheila	Clifford		Yes	Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.						Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
0 0 0 7- 0 0 0 1	Individual	Bruce	Cochrane		Not Stated	T1	Not Stated	I am concerned that as a resident of Canvey Island for the last [REDACTED] the road infrastructure is not adequate for more housing development our community doesn't want any more large housing projects unless they can get a traffic plan in place If you have to phone a emergency vehicle when the traffic is heavy you can possibly die or your house can burn down as nothing moves at rush hours not hours	Not Stated	Not Stated			Not Stated		No		Resident objects to further housing on Canvey Island due to inadequate road infrastructure and emergency access risks.	Noted. Infrastructure needs established in INFRA policies supported by background evidence Infrastructue Delivery Plan (IDP) Policy INFRA1 requires transport impacts to be assessed and mitigated.	N

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0 2 0 5- 0 0 0 1	Individual	Hal ey	Coc kayn e		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	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	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	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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											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						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	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>	

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											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.								
0 2 0 5- 0 0 0 2	Individual	Hal ey	Coc kayn e		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 5 5 1 - 0 0 0 1	Individual	Shar on	Cola yir		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0551-002	Individual	Shar on	Cola yir		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 5 1 - 0 0 0 3	Individual	Shar on	Cola yir		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	

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0 5 4 9 - 0 0 0 1	Individual	Jean	Cole		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0549-0002	Individual	Jean	Cole		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 4 9 - 0 0 0 3	Individual	Jean	Cole		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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0 6 3 8- 0 0 0 1	Individual	Tracy	Cole		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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1 0 5 9- 0 0 0 1	Individual	Jean	Cole		Yes	HAD4	Yes		No	Effective, Justified	This submission is our response in opposition to policy HAD4 as set out on page 73 of The Castle Point Plan. As retired professionals we moved to Hadleigh in May 2025, to be closer to members of our family, but also to enjoy Hadleigh, which we believe is unique in that it has a semi rural combination of open spaces, playing fields, woodlands and a high street. We believe this combination contributes towards a strong sense of community. We believe planes to be a clear case of overdevelopment and I'm realistic it will create a density of 100 dwellings per hectare in a residential area of housing. Currently having homes of 20 dwellings per hectare. Housing on this site at 100	We would support the development of such a community in the North West Thundersley area where there could be easier access to major road links and installation of utility and services.	No	Not Ans wer ed	Not Ans were d	A	Objects to HAD4 because: Density Traffic Infrastructure Concern regarding reference to hadleigh junior school and not infants school on page 212 Proposal contradicts objective 19 due to loss of a playing field North West Thundersley	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											dwellings per hectare would equate to 6 blocks of flats, four flats per floor, and four stories high, which is out of character for the area. The statement that the frontage of the development is designed to reflect the character of scrub Lane is a complete fabrication, as the house is opposite, relate to approximately 15 dwellings per hectare and will never match the current street scene. The addition of 114 homes and over 200 cars, would cause major issues at the scrub Lane/Rectory Road, traffic lights The plans would also cause an extra burden on the area’s General Practitioner surgery -the Hollies- as well as affecting electrical, water, gas and other services. We note that on													Reference to Hadleigh Junior school as a locally important heritage asset on page 212 is due to the heritage aspect rather than the importance of the building as an education facility. Policy HAD4 requires suitable mitigation for the loss of the playing field facility in accordance with objective 19 North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the	

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
											page 212 of the plan, that the council only lists the Hadleigh Junior school as an important asset, but does not include the infants school and nursery as part of this list. This leads us to believe that the planned development is only the first phase of further plans to build on the rest of the playing field including land currently occupied by the Hadleigh Infant School. The school playing field is in daily use by school children Monday to Friday and various football clubs at the weekend. In our opinion the development further undermines objective 19 on page 18 of the plan, which states: “Secure improved health and wellbeing outcomes for residents enabling more active and healthier lifestyles, creating healthy Living							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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											environments and reducing health inequalities.” Physical activity has been shown be very beneficial in preventing and reducing obesity in children and also contributing towards good mental health. It also provides an environment for young people to develop their social skills, teamwork and communication. We believe that the council should be reaching out and consulting with various groups regarding how to make better use of the playing field in its current form, rather than reducing it with the planned development.								
1 3 6 0- 0 0 0 1	Individual	Jean	Cole			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											policy should allow further development which improves the overall site environment for the local residents.								
1 3 6 0- 0 0 0 2	Individual	Jean	Cole			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	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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											Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.							Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is	Strategic Flood Risk Assessment (SFRA).

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																		adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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																		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	

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																		highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in	

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																		policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 6 0- 0 0 0 3	Individual	Jean	Cole			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 3 4 8- 0 0	Individual	Debie	Collins			Had 4	Not Stat ed	My objections is the volume of the numbers homes and the number of habitable rooms on this site. Traffic in Scrub Lane is already conjested during school pick up and drop off times. The development will	Not Sta ted								Policy Had 4. Objects to proposed development numver of habitable rooms. Will	Infrastructure: Infrastructure matters are covered by policies INFRA1-6 and the supporting	N

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0 1								increase traffic volume generally in the road. How will the current school be able to accommodate the additional number of children?									cause traffic congestion. Concern over availability of school places.	Infrastructure Delivery Plan (IDP). Highways Impacts: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	
0 7 7 3- 0 0 0 1	Individual	Loui se	Colli ns		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt / Grey Belt sites added, with	Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/ Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Ans wer ed	Not Ans were d	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	N

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											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							housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these	

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																		delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not	

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																		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. North West	

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																		Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from	

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																		flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here	

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																		www.castlepoin t.gov.uk/emerge ncyplanning/	
1 0 6 0- 0 0 0 1	Individual	Dea n	Colli ns		Yes	SP3	No	I think it fails to consider some basic Human Rights principles set out in the ECHR.	No	Positively prepared, Effective, Justified	1/lts not been resident led and has very much been played out on facebook rather than advertised to the wider community. 2/Far too much burden put on canvey island and anyone who feels that canvey was able to take more traffic needs to be put in a straight jacket and taken to	I don't believe even a third road could elevate the problems that these extra properties would bring. The slightest little issue now and Canvey becomes gridlocked If this plan goes through those who have engineered it at some point will undoubtedly have blood on their hands	Yes	Not Ans wer ed	Not Ans were d	A	Fails to consider human rights in accordance with the ECHR lack of public consultation Too many homes on Canvey due to traffic	The local Plan respects the convention rights and part of examination will confirm if it is legally compliant which includes compliance with the Human Rights Act. Public Consultation The council has prioritised	N

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											a sanatorium. 3/The plan has very much been weighted in favour of the larger party who have protected their own wards							inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle	

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																		Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.	
1 3 9 9- 0 0 0 1	Individual	Jam es	Colli ns		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N
1 4 2 9- 0 0 0 1	Individual	Mrs	Colli ns		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Considers the Draft Plan to be sound.	Support noted	N

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0 5 5 7 - 0 0 0 1	Individual	Lind a	Con lon		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 5 7 - 0 0 0 2	Individual	Lind a	Con lon		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 5 7 - 0 0 0 3	Individual	Linda	Conlon		Yes	For eword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
1 3 5 8- 0 0 0 1	Individual	Linda	Conlon			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											the overall site environment for the local residents.								
1 3 5 8- 0 0 0 2	Individual	Lind a	Con lon			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	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm

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											proposed 3316 urban homes for Canvey is not resident led.							5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further	ent (SFRA).

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																		information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt	

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																		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 highway network in and around Castle Point, Evidence	

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																		of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk	

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																		Assessment (SFRA), 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.	
1 3 5 8- 0 0 0 3	Individual	Lind a	Con lon			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 1 9 9- 0 0 0 1 1	Individual	Julia	Con nor		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		No		Housing target for Castle Point not met. The site selection ignores Greenbelt /	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the	Y - Policy SD3(3) 3. Proposal s must demonstr ate how

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								Thundersley. It has no credible five-year housing land supply.			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.						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	supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SuDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																	led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0 1 9 9- 0 0 0 2	Individual	Julia	Con nor		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0 5 0 4 - 0 0 0 1	Individual	Tho mas	Coo k		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 0 4 - 0 0 0 2	Individual	Tho mas	Coo k		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 0 4 - 0 0 0 3	Individual	Tho mas	Coo k		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	

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0 5 2 6 - 0 0 0 1	Individual	Ann e	Coo k		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0526-0002	Individual	Anne	Cook		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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0 5 2 6 - 0 0 0 3	Individual	Ann e	Coo k		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	

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0 5 6 9 - 0 0 0 1	Individual	Mari lyn	Coo k		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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

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

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0569-0002	Individual	Marilyn	Cook		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 6 9 - 0 0 0 3	Individual	Mari lyn	Coo k		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	

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0 5 9 5 - 0 0 0 1	Individual	Ros e	Coo k		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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																		above. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoin t.gov.uk/emerge ncyplanning/ Third Road 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.	

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

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0 5 9 5 - 0 0 0 2	Individual	Ros e	Coo k		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 9 5 - 0 0 0 3	Individual	Ros e	Coo k		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
0 9 2 1- 0 0 0 1	Individual	Michael	Cook		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 9 3 6- 0 0	Individual	Graham	COOK	NO	Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 1																			
0 2 7 0- 0 0 0 1	Organisatio n	And y	Coo mbe s	Mano r Traini ng Centr e UK ltd	Yes	B8	No	I am a local business on the Manor Trading Estate and have had a presence on the estate since 2006. 1st I record that I have had the opportunity to read and fully understand my neighbour “G&K Groundworks Ltd” Unsound submission. For clarity I attach a copy of G&Ks submission to this e-mail.	No	Not Stated	I record here that Manor Training Centre UK Ltd agree with G&K Groundworks Ltd.’s that the regulation 19 draft as presented is Unsound. For the record and as relayed in G&K Groundworks Ltd submission • CPBC have never engaged with me / my business about our future on this estate. • Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough • I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. I am certainly more confused now!	Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business.	No		Yes, attache d is G&K Groundworks ltd's response to the consultation		The regulation 19 draft as presented is Unsound. CPBC have never engaged with the business community on this estate. Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. Some	Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	N

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											Where am I going to be re-homed? This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it's OK to treat us the MTE business community with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy.						Background G&K are the title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre's which is except for connect packaging the largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers,		

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																	councillors nor CPBC co- opted Deyton Bell. Fact this property has warehousing & storage buildings along with separate offices and external yards • 10 units have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to		

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																	the local economy. It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Questions over consistency with CPBC Regeneration policies		

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0 6 1 2 - 0 0 0 1	Individual	Lind a	Coo per		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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

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

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0612-0002	Individual	Linda	Cooper		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 6 1 2 - 0 0 0 3	Individual	Linda	Cooper		Yes	For eword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	

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0793-0001	Individual	Maria	Cooper	N/A	Yes	SP3	No	Re: Castle Point Plan – Regulation 19 Draft (July 2025) – Objection I write as a resident of Canvey Island to make representations in objection to aspects of the Castle Point Plan (Regulation 19 draft, July 2025). While I appreciate the effort that has gone into preparing this Plan, I believe that certain proposals (especially those affecting Canvey Island) are unsound, insufficiently justified and pose serious risks to local communities, infrastructure, environment and quality of life. I urge that these matters be revisited and amended before the Plan is submitted for examination. Below are my specific objections and requests.  1. Over-allocation of homes in Canvey Island, given infrastructure vulnerability - The Plan proposes to allocate over 3,300 homes on Canvey Island. Such scale of development risks placing unsustainable pressure on already stretched infrastructure (roads, sewage, flood protection, health, schools, etc.). - In particular, I note that Canvey Island has significant infrastructure vulnerabilities. The Plan’s evidence base does not convincingly show how the	No	Consistent with national policy	Re: Castle Point Plan – Regulation 19 Draft (July 2025) – Objection I write as a resident of Canvey Island to make representations in objection to aspects of the Castle Point Plan (Regulation 19 draft, July 2025). While I appreciate the effort that has gone into preparing this Plan, I believe that certain proposals (especially those affecting Canvey Island) are unsound, insufficiently justified and pose serious risks to local communities, infrastructure, environment and quality of life. I urge that these matters be revisited and amended before the Plan is submitted for examination. Below are my specific objections and requests.  1. Over-allocation of homes in Canvey Island, given infrastructure vulnerability - The Plan proposes to allocate over 3,300 homes on Canvey Island. Such scale of development risks placing unsustainable pressure on already stretched infrastructure (roads, sewage, flood protection, health, schools, etc.). - In particular, I note that Canvey Island has significant infrastructure vulnerabilities. The Plan’s evidence base does not convincingly show how the cumulative impacts of this level Below are my specific objections and requests. 	Re: Castle Point Plan – Regulation 19 Draft (July 2025) – Objection I write as a resident of Canvey Island to make representations in objection to aspects of the Castle Point Plan (Regulation 19 draft, July 2025). While I appreciate the effort that has gone into preparing this Plan, I believe that certain proposals (especially those affecting Canvey Island) are unsound, insufficiently justified and pose serious risks to local communities, infrastructure, environment and quality of life. I urge that these matters be revisited and amended before the Plan is submitted for examination. Below are my specific objections and requests.  1. Over-allocation of homes in Canvey Island, given infrastructure vulnerability - The Plan proposes to allocate over 3,300 homes on Canvey Island. Such scale of development risks placing unsustainable pressure on already stretched infrastructure (roads, sewage, flood protection, health, schools, etc.). - In particular, I note that Canvey Island has significant infrastructure vulnerabilities. The Plan’s evidence base does not convincingly show how the cumulative impacts of this level	No	Not Answered	Not Answered	A	Infrastructure Transport Third Road onto Canvey Flood Risk on Canvey Green/Grey belt Alternative sites	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and	N

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								cumulative impacts of this level of housing will be mitigated to avoid severe harm. - Without firm and funded commitments to improving key infrastructure (transport links, drainage/flood defences, capacity of utilities and services), such housing allocation could lead to deterioration of living conditions for existing and new residents. 2. Transport, highways and accessibility concerns - Access from Canvey Island / developments may further exacerbate congestion, especially at major junctions, and the Plan lacks clarity or certainty on how road and traffic impacts will be managed. - Evidence supplied so far appears weak in demonstrating how additional vehicle movements will be accommodated without severe negative effects. - Particularly, any reliance on accessing the A127 / A130 (or use of congested local roads) must be justified, with robust modelling and mitigation. 3. Flood risk and environmental constraints - Canvey Island, being low-lying and with existing flood risk, may not be a suitable location for large scale development unless flood risk is fully addressed. The Plan’s flood risk assessments should			1. Over-allocation of homes in Canvey Island, given infrastructure vulnerability - The Plan proposes to allocate over 3,300 homes on Canvey Island. ² Such scale of development risks placing unsustainable pressure on already stretched infrastructure (roads, sewage, flood protection, health, schools, etc.). - In particular, I note that Canvey Island has significant infrastructure vulnerabilities. ² The Plan’s evidence base does not convincingly show how the cumulative impacts of this level of housing will be mitigated to avoid severe harm. - Without firm and funded commitments to improving key infrastructure (transport links, drainage/flood	of housing will be mitigated to avoid severe harm. - Without firm and funded commitments to improving key infrastructure (transport links, drainage/flood defences, capacity of utilities and services), such housing allocation could lead to deterioration of living conditions for existing and new residents. 2. Transport, highways and accessibility concerns - Access from Canvey Island / developments may further exacerbate congestion, especially at major junctions, and the Plan lacks clarity or certainty on how road and traffic impacts will be managed. - Evidence supplied so far appears weak in demonstrating how additional vehicle movements will be accommodated without severe negative effects. - Particularly, any reliance on accessing the A127 / A130 (or use of congested local roads) must be justified, with robust modelling and mitigation. 3. Flood risk and environmental constraints - Canvey Island, being low-lying and with existing flood risk, may not be a suitable location for large scale development unless flood risk is fully addressed. The Plan’s flood risk assessments should be very carefully scrutinised, and appropriate mitigation required (including sustainable drainage, green infrastructure, etc.).					around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on		

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								be very carefully scrutinised, and appropriate mitigation required (including sustainable drainage, green infrastructure, etc.). • Also, environmental assets, green/open spaces, biodiversity, and Green Belt/grey belt protections must be respected. Any encroachment on such areas should only occur after full assessment and only if no reasonable alternative exists. 4. Green Belt / Grey Belt / Urban Capacity • The Plan claims to avoid Green Belt development and to focus on urban capacity. • However, given the number of houses proposed in Canvey, there is concern whether urban capacity alone is sufficient, and whether some sites already considered might have unacceptable impacts. • If the Council is to rely on urban sites, these must be deliverable, accessible, sustainable, and not cause unacceptable adverse effects (traffic, services, amenities, character etc.). 5. Lack of clarity on delivery, timing and funding of mitigation • The Plan identifies infrastructure costs of tens of millions. For example, the Infrastructure Delivery Plan estimates ~£63m excluding transport in some instances. • But the Plan does not clearly set out how or when these			defences, capacity of utilities and services), such housing allocation could lead to deterioration of living conditions for existing and new residents. 2. Transport, highways and accessibility concerns • Access from Canvey Island / developments may further exacerbate congestion, especially at major junctions, and the Plan lacks clarity or certainty on how road and traffic impacts will be managed. • Evidence supplied so far appears weak in demonstrating how additional vehicle movements will be accommodated without severe negative effects. • Particularly, any reliance on accessing the A127 / A130 (or use of congested local roads) must be justified, with robust modelling and mitigation.	• Also, environmental assets, green/open spaces, biodiversity, and Green Belt/grey belt protections must be respected. Any encroachment on such areas should only occur after full assessment and only if no reasonable alternative exists. 4. Green Belt / Grey Belt / Urban Capacity • The Plan claims to avoid Green Belt development and to focus on urban capacity. ☒ • However, given the number of houses proposed in Canvey, there is concern whether urban capacity alone is sufficient, and whether some sites already considered might have unacceptable impacts. • If the Council is to rely on urban sites, these must be deliverable, accessible, sustainable, and not cause unacceptable adverse effects (traffic, services, amenities, character etc.). 5. Lack of clarity on delivery, timing and funding of mitigation • The Plan identifies infrastructure costs of tens of millions. For example, the Infrastructure Delivery Plan estimates ~£63m excluding transport in some instances. ☒ • But the Plan does not clearly set out how or when these mitigations will be funded, delivered, monitored. Without such certainty, there is risk that development proceeds ahead of needed infrastructure improvements. • Also, there is risk that the viability of housing delivery,					Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional		

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								mitigations will be funded, delivered, monitored. Without such certainty, there is risk that development proceeds ahead of needed infrastructure improvements. - Also, there is risk that the viability of housing delivery, especially mixed use/town centre regeneration, may be compromised without financial support/regeneration funding. 6. Soundness and compliance with national policy - The Plan must satisfy the tests of soundness under the National Planning Policy Framework (NPPF 2024), especially: a) Positively prepared — meeting objectively assessed need where possible; b) Justified — having considered reasonable alternatives and based on proportionate evidence; c) Effective — being deliverable in the Plan period; d) Consistent with national policy — especially in relation to flood risk, Green Belt protection, infrastructure and habitat protection. - I submit that the proposals for Canvey fail on several of these: the evidence for infrastructure mitigation is not sufficiently detailed; reasonable alternatives (lower housing densities, redirecting growth to less vulnerable areas) have not been fully explored; and risks (flood, congestion) may make parts of the strategy ineffective or			3. Flood risk and environmental constraints - Canvey Island, being low-lying and with existing flood risk, may not be a suitable location for large scale development unless flood risk is fully addressed. The Plan’s flood risk assessments should be very carefully scrutinised, and appropriate mitigation required (including sustainable drainage, green infrastructure, etc.). - Also, environmental assets, green/open spaces, biodiversity, and Green Belt/grey belt protections must be respected. Any encroachment on such areas should only occur after full assessment and only if no reasonable alternative exists. 4. Green Belt / Grey Belt / Urban Capacity - The Plan claims	especially mixed use/town centre regeneration, may be compromised without financial support/regeneration funding. ☒ 6. Soundness and compliance with national policy - The Plan must satisfy the tests of soundness under the National Planning Policy Framework (NPPF 2024), especially: a) Positively prepared — meeting objectively assessed need where possible; b) Justified — having considered reasonable alternatives and based on proportionate evidence; c) Effective — being deliverable in the Plan period; d) Consistent with national policy — especially in relation to flood risk, Green Belt protection, infrastructure and habitat protection. - I submit that the proposals for Canvey fail on several of these: the evidence for infrastructure mitigation is not sufficiently detailed; reasonable alternatives (lower housing densities, redirecting growth to less vulnerable areas) have not been fully explored; and risks (flood, congestion) may make parts of the strategy ineffective or harmful. 7. Equality / Health / Community Impacts - The Equality Impact Assessment (EQIA) accompanying the Plan is welcome in intention. ☒ But for Canvey, many of the negative impacts fall disproportionately					flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Green/Grey Belt The Council has undertaken a Green Belt		

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								difficult access). 4. Ensure that delivery plans (funding, phasing) are explicit, transparent and enforceable, so that development does not outpace essential services. 5. Strengthen monitoring and accountability mechanisms, so that residents can see whether mitigation promises are being met. 6. Ensure that any development respects the environmental constraints of Canvey Island, preserves green/open spaces, protects biodiversity, and manages flood risk in line with best practice and national policy. I trust the Council will take these concerns seriously in finalising the Plan. I am willing to meet or provide further evidence in support of these objections. Please confirm that this representation will be officially considered at examination.			not clearly set out how or when these mitigations will be funded, delivered, monitored. Without such certainty, there is risk that development proceeds ahead of needed infrastructure improvements. • Also, there is risk that the viability of housing delivery, especially mixed use/town centre regeneration, may be compromised without financial support/regeneration funding. 6. Soundness and compliance with national policy • The Plan must satisfy the tests of soundness under the National Planning Policy Framework (NPPF 2024), especially: a) Positively prepared — meeting objectively assessed need where possible; b) Justified — having considered reasonable alternatives and based on proportionate	6. Ensure that any development respects the environmental constraints of Canvey Island, preserves green/open spaces, protects biodiversity, and manages flood risk in line with best practice and national policy. I trust the Council will take these concerns seriously in finalising the Plan. I am willing to meet or provide further evidence in support of these objections. Please confirm that this representation will be officially considered at examination.					of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Alternative Sites All reasonable option sites were considered in the Strategic		

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											evidence; c) Effective — being deliverable in the Plan period; d) Consistent with national policy — especially in relation to flood risk, Green Belt protection, infrastructure and habitat protection. • I submit that the proposals for Canvey fail on several of these: the evidence for infrastructure mitigation is not sufficiently detailed; reasonable alternatives (lower housing densities, redirecting growth to less vulnerable areas) have not been fully explored; and risks (flood, congestion) may make parts of the strategy ineffective or harmful. 7. Equality / Health / Community Impacts • The Equality Impact Assessment (EQIA) accompanying the Plan is welcome in intention. 2 But for Canvey, many of														Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	

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											the negative impacts fall disproportionately on vulnerable groups (older people, low income households, people with health vulnerabilities) due to existing deficits in access to healthcare, etc. • Also, increased demand on public services (e.g. schools, health, social care) without matching improvements may reduce quality or availability.  Conclusion and Requests Given these objections, I request that the Council: 1. Reconsider the scale of housing proposed for Canvey Island, reducing to a level that infrastructure can support without risk of severe harm. 2. Provide clearer, costed, and time-bound commitments for critical									

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											infrastructure mitigation (transport, flood protection, drainage, wastewater, health, etc.) before allocating further development. 3. Undertake further assessment of alternative sites or lower density options, particularly avoiding high risk / high cost sites (flood-prone, difficult access). 4. Ensure that delivery plans (funding, phasing) are explicit, transparent and enforceable, so that development does not outpace essential services. 5. Strengthen monitoring and accountability mechanisms, so that residents can see whether mitigation promises are being met. 6. Ensure that any development respects the environmental constraints of Canvey Island, preserves green/open									

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											spaces, protects biodiversity, and manages flood risk in line with best practice and national policy.  I trust the Council will take these concerns seriously in finalising the Plan. I am willing to meet or provide further evidence in support of these objections. Please confirm that this representation will be officially considered at examination. 										

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0 9 1 6- 0 0 0 1	Individual	Stua rt	Coo per		Yes	HA D4	Yes	N/a	No	Consistent with national policy	Re: Objection to Policy HAD4 – Land South of Scrub Lane, Hadleigh (Proposed Allocation of at least 114 Dwellings) I write to object to the proposed allocation of at least 114 dwellings on Land South of Scrub Lane (Policy HAD4) in the Draft Castle Point Plan (Regulation 19, 2025). I believe the proposal conflicts with national planning policy (NPPF, 2024), UK environmental legislation (Environment Act 2021), and Castle Point’s own strategic and place-based policies. For the reasons set out below, the allocation should be refused or substantially modified. --- 1. Overdevelopment and Density	Abandon the development of the green space south of Scrub Lane. Please refer to all other comments in this Objection.	No	Not Ans wer ed	Not Ans were d	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Green Belt Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	N	

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											Policy HAD4 allocates at least 114 homes on a site of approximately one hectare. This represents an excessively high density for a greenfield edge-of-settlement location. Castle Point Policy SP2 (“Making effective use of urban land and creating sustainable places”) requires density targets to reflect the characteristics of different areas. The Scrub Lane site lies on the urban edge of Hadleigh, adjacent to open countryside, and such an intensive scheme would undermine local character. NPPF Paragraphs 119–120 require efficient land use, but emphasise that development density must reflect the prevailing character and setting. This													Green Belt This land is not allocated as Green Belt	

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											allocation does not respect those principles and risks creating cramped, poor-quality living environments. --- 2. Loss of Green Land and Environmental Value The site is presently open green land providing important ecosystem services — biodiversity, carbon sequestration, flood absorption, and landscape character. Castle Point Policy SP1 (“Supporting an enhancement of the Borough’s green spaces”) requires the protection and enhancement of green space. HAD4 would result in its permanent loss. NPPF Paragraphs 179–180 require										

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											policies and decisions to protect and enhance valued landscapes and biodiversity, to deliver net gains, and to maintain ecological networks. Under the Environment Act 2021, development must provide a minimum 10% Biodiversity Net Gain. With such intensive use, it is unclear how HAD4 could achieve this without substantial off-site measures. --- 3. Infrastructure Capacity Development of 114 dwellings would generate significant additional demand on local infrastructure, services, and utilities. Castle Point Policy SP4 (“Development										

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											contributions”) requires that new development must provide adequate contributions to education, healthcare, transport, and utilities. No clear mitigation strategy has been presented for HAD4. NPPF Chapter 8 requires planning decisions to ensure sufficient provision of community facilities and services. Schools, GP surgeries, and local roads in Hadleigh are already under pressure and risk being overburdened. --- 4. Flood Risk and Drainage Castle Point is particularly vulnerable to flood risk, and development on greenfield sites can exacerbate surface water flooding.									

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											NPPF Paragraphs 167–169 (Chapter 14) require development to be directed away from areas at highest flood risk, and to provide robust mitigation including sustainable drainage systems (SUDS). The Castle Point Plan’s policies on climate resilience (SD1–SD3) similarly require comprehensive flood mitigation and sustainable drainage. HAD4 does not provide adequate assurances in this respect. --- 5. Design Quality and Local Character High-quality design is a core principle of sustainable development. The Castle Point Residential Design Guidance (2013)									

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

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											6. Green Belt / Countryside Considerations If the site falls within, or adjacent to, Green Belt designation: NPPF Paragraphs 142–160 confirm that Green Belt boundaries should be altered only in exceptional circumstances. Protecting openness and preventing urban sprawl are fundamental. The HAD4 allocation does not demonstrate exceptional justification. Even if not formally designated, the site contributes to the openness and character of Hadleigh’s edge and should be safeguarded. --- 7. Legal and Policy Inconsistencies The allocation conflicts with									

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											Castle Point Strategic Policies SP1, SP2, and SP4, as well as HAD4’s own requirement to deliver sustainable and context-appropriate growth. It conflicts with the NPPF (2024) requirements in Chapters 11, 12, 14, and 15. It may fail to comply with the Environment Act 2021 requirement for Biodiversity Net Gain. --- Conclusion Policy HAD4 – Land South of Scrub Lane is unsound because: It represents overdevelopment of a sensitive greenfield edge-of-settlement site. It causes the irreversible loss of valued green land, contrary to Castle Point and national								

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											policy. It places unsustainable pressure on local infrastructure and services. It lacks robust provision for flood risk mitigation, biodiversity, and green infrastructure. It fails the tests of soundness set out in the NPPF (positively prepared, justified, effective, consistent with national policy). For these reasons, I respectfully urge Castle Point Borough Council to remove or substantially amend Policy HAD4 from the Draft Plan.								

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1 0 5 2- 0 0 0 1	Individual	Car ey	Coo per		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. Canvey Island is	Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Answered	Not Answered	A	North West thundersley No five year housing land supply Doesn't meet housing targets Green/Grey Belt Canvey floodrisk Emergency Evacuation	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	N

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											referred to by Anglian Water as a blockage hotspot. Further housing will only add to an already struggling 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.							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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																		again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North	

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																		West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the	

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																		natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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																		site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flood risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood	

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																		management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoin t.gov.uk/emergencyplanning/	
1 3 4 5- 0 0 0 1	Individual	Lind a	Coo per			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											the overall site environment for the local residents.								
1 3 4 5- 0 0 0 2	Individual	Lind a	Coo per			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	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm

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																		information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt	

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																		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 highway network in and around Castle Point, Evidence	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk	

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																		Assessment (SFRA), 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.	
1 3 4 5- 0 0 0 3	Individual	Lind a	Coo per			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 6 5 8- 0 0 0 1	Individual	Dou glas	Cop ping		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid ence sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 7 2 2- 0 0 0 1	Individual	Tim oth y	Cop sey		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 9 7 2- 0 0 0 1	Individual	Lisa	COP SEY		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 0 8 0- 0 0 0 1	Individual	Lyn ne	Cor nish		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	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 predetermine d towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has	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	N

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											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.						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.	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.	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	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.		
0 0 8 0- 0 0 0 2	Individual	Lyn ne	Cor nish		Yes	C4	No		No	Justified, Consistent with National policy	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 0 9 6- 0 0 0 1	Individual	Cliff	Cor nish		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	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	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumst

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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.					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 predetermine d 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	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	ances, 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 Assessm ent (SFRA).	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	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.	
0 0 9 6- 0 0 0 2	Individual	Cliff	Cor nish		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	evacuation procedures		
0 7 6 1- 0 0 0 1	Individual	Ralp h	Cor nish		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage	Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/ Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Ans wer ed	Not Ans were d	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	N

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											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.							should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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																		housing topic paper. 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	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not	

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																		considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	
0700001	Individual	Lary a	Cor nth wait e		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
064	Individual	Mat the w	Cort es		Yes	Wh ole	Yes		Yes			There needs to be far better infrastructure before any new homes are built.	No	Not Ans	Not Ans	A	Castle Point Plan is sound	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0- 0 0 0 1						Pla n								wer ed	were d		and legally compliant,		
0 0 2 8- 0 0 0 1	Individual	Paul	Cort hwa ite		Yes	Wh ole Pla n	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness' , as set out in the National Planning Framework	Yes				Not Stat ed		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0 1 3 1- 0 0 0 1	Individual	Ge mm a	Cos gro ve		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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 predetermine d 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	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. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design

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											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.						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.	Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0 1 3 1- 0 0 0 2	Individual	Ge mm a	Cos gro ve		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 9 8 4- 0 0 0 1	Individual	Rob in	Cotg rove		Yes	Wh ole Pla n	Yes		Yes				No	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 6 2 5- 0 0 0 1	Individual	Rob ert	Cott is- Well s		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed			Castle Point Plan is sound and legally compliant,	Support noted.	N
0 6 5 4- 0 0 0 1	Individual	Nat alie	Cou sins		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 6 5 5- 0 0 0 1	Individual	Neil	Cou sins		Yes	Wh ole Pla n	Yes		Yes		I'm really encouraged to see such strong and thoughtful environmental objectives in the Castle Point Local Plan. Protecting our Green Belt, improving our green and blue spaces, and creating safe, attractive green corridors will make our Borough an even better place to live, work, and explore. I'm particularly pleased to see commitments to boosting biodiversity, tackling flood risk, and moving towards net zero – these actions will benefit both current residents		Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant, particularly pleased with the environmenta l objectives and protecting the Green Belt.	Support noted.	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											and future generations. Making good use of brownfield land while safeguarding our natural assets shows a real balance between growth and care for the environment. This is exactly the kind of forward-thinking approach Castle Point needs.								
0 7 8 6- 0 0 0 1	Individual	Clar e	Cou sins		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 8 9- 0 0 0 1	Individual	Shar on	Cou sins		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 3 1 1- 0 0 0 1	Individual	Han nah	Cox		Not Stated	Had 4	No	I object to the building of new homes in relation to the about policy reference The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four	Not Sta ted	Not Stated	The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as the houses opposite relates to approx. 15dph and it will never match the current street scene. The addition of 114		Not Stat ed		No		Policy Had4 Policy: Objects as it is over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a	Noted	N

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								stories high, which is out of character for the area.			homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Road traffic lights. The addition of 114 homes would add over 300 people to the Hollies surgery. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage in these urban areas. Residents said use the Brownfield sites, but not to destroy those areas like Scrub Lane with over development. It also says the loss of playing field land is mitigated by an appropriate financial contribution towards new or enhanced playing field facilities nearby, so does this include the school field.						100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. Disagrees that it can be designed to reflect the adjacent character of Scrub Lane.		

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0 4 9 4 - 0 0 0 1	Individual	Deb orah	Cox		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0494-0002	Individual	Deborah	Cox		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 4 9 4 - 0 0 0 3	Individual	Deb orah	Cox		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
1 0 3 1- 0 0 0 1	Individual	Emil y	Cox		Yes	HA D4	Yes		No	Effective	It will cause absolute aggravation on the roads that are already busy and congested. The school is too close to have a number of properties built in such close proximity.		No	Not Ans wer ed	Not Ans were d		Objecting to HAD4 because: Traffic Close proximity to the school	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5	N

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																		to ensure sufficient highway impact mitigation. Close proximity to the school Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents.	
1 4 2 5- 0 0 0 1	Individual	Rich ard	Cox		Yes	Wh ole Pla n	No	Not fit for purpose	No	Consistent with National Policy	Does not address national policy requirements.	Needs broader vision and consideration of other areas for development (e.g Thundersley). Current proposals allocation of 'grey belt' is misleading and I don't feel it is accurate. I feel that the plan lacks any robust and meaningful attempt to address national policy, which puts green belt and treasured community spaces at risk of development - when other, more suitable areas have not been considered, or included in the proposal.					Does not address national policy requirements . Needs broader vision and consideration of other areas for development (e.g Thundersley). Current proposals allocation of 'grey belt' is misleading and I don't feel it is accurate. I feel that the	All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	N

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																	plan lacks any robust and meaningful attempt to address national policy, which puts green belt and treasured community spaces at risk of development - when other, more suitable areas have not been considered, or included in the proposal.	West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments.	

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0 6 1 3 - 0 0 0 1	Individual	Lind a	Coyt e		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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0613-002	Individual	Linda	Coyte		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 6 1 3 - 0 0 0 3	Individual	Linda	Coyte		Yes	For eword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
1 3 3 1- 0 0 0 1	Individual	Mrs L	Coyt e			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											the overall site environment for the local residents.								
1 3 3 1- 0 0 0 2	Individual	Mrs L	Coyt e			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	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	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 Assessm

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											proposed 3316 urban homes for Canvey is not resident led.							5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further	ent (SFRA).

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																		information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt	

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																		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 highway network in and around Castle Point, Evidence	

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																		of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk	

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																		Assessment (SFRA), 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.	
1 3 3 1- 0 0 0 3	Individual	Mrs L	Coyt e			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 3 4 2- 0 0 0 1	Individual	Larr y	Coyt e			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.								
1 3 4 2- 0 0 0 2	Individual	Larr y	Coyt e			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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											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.							important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land	and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley	

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																		was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 4 2- 0 0 0 3	Individual	Larr y	Coyt e			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 3 8- 0 0 0 1	Individual	Jani ce	Cra mer		Yes	SP3	No	Dear Sir or Madam, I am emailing to protest against the Castle Point plan. I am a Canvey Island resident and it is ludicrous that you propose to build over 3,300 homes here. It is extremely excessive compared to Benfleet, Hadleigh and Thundersley! I understand we have to build more affordable homes in CP borough, but make it fair across the borough, not mainly all on Canvey. There are many reasons why Canvey Island is not suitable for development. * Canvey Island is a flood plain, built with dykes and soakaways. The ground is mainly clay, it is well known for surface water flooding and is a tidal flood risk. * Current drainage systems are inadequate, our own home was flooded in the 2014 storm where drains could not cope, hundreds of homes were damaged which took months to dry out and be repaired. There has been no upgrade to drainage since, so this could easily happen again, especially with climate change and adverse weather conditions. * There are only two roads on and off of Canvey Island, the traffic is horrendous especially weekends and rush hour. If there is an accident, breakdown or roadworks, the whole island comes to a standstill (which is a regular occurrence unfortunately.) * We have hazardous Industries on Canvey, mainly the gas terminals, if ever, God forbid	No	Not Stated			Not Stat ed		No	A	Disproprtiona te growth directed to Canvey. Canvey Island is not suitable for development. • Canvey Island is a flood plain, built with dykes and soakaways. The ground is mainly clay, it is well known for surface water flooding and is a tidal flood risk. • Current drainage systems are inadequate, our own home was flooded in the 2014 storm where drains could not cope, hundreds of homes were damaged which took months to dry out and be repaired. There has been no upgrade to drainage since, so this	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
								there was an emergency, how would the public evacuate and how would emergency services get on the island! * Current infrastructure could not cope with 3,300 more homes - Gp's, dentists, schools, social care, transport etc. etc. Yes, Castle Point do need to build more homes, and I believe with many, many others, that there are more suitable sites that could be investigated, such as North West Thundersley or 'Blinking Owl Site'. I hope you listen to all our objections and reconsider this plan.									could easily happen again, especially with climate change and adverse weather conditions. • There are only two roads on and off of Canvey Island, the traffic is horrendous especially weekends and rush hour. If there is an accident, breakdown or roadworks, the whole island comes to a standstill (which is a regular occurrence unfortunately .) • We have hazardous Industries on Canvey, mainly the gas terminals, if ever, God forbid there was an emergency, how would the public evacuate and	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. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not	

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																	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.	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).	
0 1 4 6- 0 0 0 1	Individual	Jacq ueli ne	Cra nfiel d		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		No		Housing target for Castle Point not met. The site selection ignores Greenbelt /	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the	Y - Policy SD3(3) 3. Proposals must demonstrate how

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
								Thundersley. It has no credible five-year housing land supply.			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.						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	supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SuDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																	residents in the East at risk with emergency evacuation procedures.		
0 1 4 6- 0 0 0 2	Individual	Jacq ueli ne	Cra nfiel d		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
1 0 6 4- 0 0 0 1	Individual	Sam	Cra wfo rd		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 2 9 9- 0 0 0 1	Individual	Car ol	Cra wley		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	<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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-

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											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.						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 flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	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 and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs Policy SD3 covers SuDs	blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																	and drainage infrastructure . The 3,316+ urban homes for Canvey is not resident led.	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.	
0 2 9 9- 0 0 0 2	Individual	Car ol	Cra wley		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 1 3 5- 0 0 0 1	Individual	Hayl ey	Cre gan		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the

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											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.						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.	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).
0 1 3 5- 0 0	Individual	Hayl ey	Cre gan		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting Infrastructure	N

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02																	emergency evacuation procedures	Delivery Plan (IDP).	
1408-0001	Individual	George	Cripps		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N
0459-0001	Individual	Charlie	Crow		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 4 9 6 - 0 0 0 1	Individual	San dra	Cro whu rst		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0496-0002	Individual	Sandra	Crowhurst		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 4 9 6 - 0 0 0 3	Individual	San dra	Cro whu rst		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	

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0 5 1 9 - 0 0 0 1	Individual	Bria n	Cro whu rst		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 1 9 - 0 0 0 2	Individual	Bria n	Cro whu rst		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 1 9 - 0 0 0 3	Individual	Bria n	Cro whu rst		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
0 2 0 8- 0 0 0 1	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 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	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.	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

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											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						Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey	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. Charfleets:	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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											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.						at 1050. Total housing target of 11,000. Object for proposals for residential on 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>	
0 2 0 8- 0 0 0 2	Individual	Gavi n	Culf f		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0208-0003	Individual	Gavin	Culford		Yes	B8	No	This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned	Not Stated	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	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	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	

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								justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.									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	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>	Assessm ent (SFRA) and recomm endation s/advice from statutory bodies (includin g EA, Essex LLFA).'

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0 4 6 9 - 0 0 0 1	Individual	Col by	Cun ning ham		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	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.					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. 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	<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. <u>Housing Supply</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	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 .	– 5 Year Supply Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability	

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																		Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
0469		Colby	Cunningham		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West						The number of Canvey West homes puts	Needs of emergency services considered in	N

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-0002											homes puts residents in the East at risk with emergency evacuation procedures.						residents in the East at risk with emergency evacuation procedures	the supporting Infrastructure Delivery Plan (IDP).	
0469-0003		Colby	Cunningham		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	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	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. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.					Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the maintenance of the lake is upkept and will detail who is responsible for this.	N

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											unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery								

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											mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake								

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											serves as an important rainwater depository, and current poor water.quality threatens users, animals and biodiversity. However, without concrete delivery-mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								
0 4 4 3 - 0 0 0 1	Individual	Nick i	Curl ing		Yes	Wh ole Pla n	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 4 2- 0 0 0 1	Individual	Mic hael	Curr igan		Yes	SP3	No		No	Justified	Too much congestion (traffic) and no improvement of infrastructure. Probably the council will introduce a congestion fee like London because of the increase of new properties to be built	Don't go ahead	No	Not Ans wer ed	Not Ans were d		Too much traffic No Infrastructure	Traffic The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the	N

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																		Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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0 0 5 4- 0 0 0 1	Individual	J	Curt is		Not Stated	SP3	Not Stat ed	To whom this May concern, I have always been concerned regarding the propose building of houses on Jotman farm, And have attended meetings at the town hall Castlepoint and attended demonstrations and written emails . i still feel the same concerns regarding the infrastructure the traffic road preparations we have more than enough traffic comes through our roads as it is i wish to vote against the proposal of houses being built.	Not Sta ted	Not stated			Not Stat ed		No		Concerned by proposed building of houses on Jotman farm, concerns regarding the infrastructure and the traffic	Noted. Infratsructure matters addressed by INFRA policies, Highways and access matters addressed by Promoting Sustainable Transport.	N
0 3 6 0- 0 0 0 1	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		C3					First the BHS acknowledges that Policy C3 - Canvey Port Facilities (d) includes equestrians when public access is sought and enhanced along the coastal path and where Item 8.30 pg. 39 repeats the opportunities.				See atta chm ent	B	Support for Policy C3 criteria d and paragraph 8.30.	Support noted.	N
0 3 6 0- 0 0 0 2	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		Par a 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 atta chm ent	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

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0 3 6 0- 0 0 0 3	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		T3					Policy T3 - Active Travel Improvements No. 5, pg. 162, confirms horse riders are included in the creation of routes to provide recreational opportunities, as justified at Item 20.39 pg. 163.				See atta chm ent	B	Support Policy T3 critiera 5 and paragraph 20.39	Support noted.	N
0 3 6 0- 0 0 0 4	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		Par a 20. 38					regarding the Thames Estuary Path and provision of a footpath and cycleway network connecting Tilbury to Leigh-on-Sea, we request inclusion and emphasise that horse riders also wish to travel further afield (at times enjoying B & Bs with their horse) in the same way as Peter de Savary's past refused intention of bridleway access to Coal House Fort, and today also to reach the likely off-road access connected to the new Thames Crossing.				See atta chm ent	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 improvments to routes to be accessible for all active travel modes.	N

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0 3 6 0- 0 0 0 5	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		T3					Today's extreme levels of traffic, besides causing deaths and injuries to riders and horses, in 2024 had a 33% rise in equestrians being the victims of road rage - a 43% increase over the previous year. The enclosed BHS News "Statistics shock" also records 81 % of incidents are caused by drivers passing too closely or too quickly. The 2022 massive rise in road incidents to 3,552 also needs remembering when horse riders have no alternative but to use roads and navigate amongst traffic to reach an off-road bridleway. On safety grounds, the BHS has already advised Castle Point of the need for an off-road BR network, in which both walkers and cyclists are legally included, but nothing has resulted. In instances in the Plan where equestrians have				See atta chm ent	B	Extreme level of traffic causing death and injuries to riders and horses. Instances in the Plan where equestrians have been excluded from proposed new walking and cycling access. Equestrian needs ignored in past Local Plans. Petition from Canvey Island Horse Riders previously, asked to urge ECC and Castle Point Borough Council to review bridleway provision in the Borough to ensure bridleways are maintained and new and safe bridleways provided. In absence of comprehensive intention	Noted. Policy T3 seeks to support active travel routes, including those for recreation for walkers, cyclists and horse riders. Essex County Council as the Highways and Transportation Authority are responsible for the management of Public Rights of Way, including Bridleways.	N

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											been excluded from proposed new walking and cycling access, we consider the Local Plan unsound and that equestrian access together with designated A 13 and A 127 road crossings are basic options that need inclusion. Until 1993, when riders achieved a few public BRs via DMMOs, Castle Point had 50 miles of public footpaths but nil BR provision. Equestrian needs were ignored in past Local Plans (apart from the 2021 dismissed Plan) to the point of discrimination. Some BR claims failed, such as the Ordnance Survey noted historic Gt. Common "Cart Track" route now banned despite ridden in the past to reach Kingsley Lane, now BR82x. In 1900 the cart track was strategically placed for all cart men from Rayleigh and surrounds to drive their horses to and from the						to address rider’s need, is the Plan legally compliant?		

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											forge existing adjacent the White Hart pub. Additionally, compared to walkers and cyclists, equestrian needs hardly featured within the 2012 Olympic local legacy; nor was any known improvement made resulting from the Rights of Way Improvement Plan (ROWIP) required from every local authority under the 2000 CROW Act. The enclosed 2010 Hansard copy of a debate on the petition presented by Canvey Island horse riders also included riding routes being barred by the Council, of a desperate need for safe places to ride and of further bridleways being needed across the whole Borough. The Government was asked to urge ECC and Castle Point Borough Council to review bridleway provision in the Borough, to ensure								

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											traditional bridleways were maintained and that new and safe bridleways were provided. The observations of the Secretary of State for Environment, Food and Rural Affairs included that the Government were committed to improving the off- road riding network and that DEFRA, too, were aware of this with needed changes detailed; the 2000 CROW Act and ROWIPs were referred as being the prime means by which local highway authorities could identify the needed changes and improvements but, as noted above, no known improvement for horse riders resulted. We wonder here in the absence of a comprehensive intention to address riders' needs, whether the Plan is legally compliant? On the mainland, paths that were also								

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											barred and locked included the "Public Open Space" link used by walkers and horse riders that existed between Central Ave. and Poors Lane, as well as horse riders barred from riding through the Belfairs Nature Reserve after nearly 40 years of known use.								
0 3 6 0- 0 0 0 6	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		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				See atta chm ent	B	Previous enjoyment of riding through the Nature Reserve from mid 1940s to 1970s. See attached submissions supporting this. Difficult to understand why Reserve is fully within the boundary of Castle Point Borough but is managed by Southend Council who have banned access to horse riders and cyclists. Southend Council byelaws – must be	The Belfairs Nature Reserve is located outside the adminstrative area of Castle Point. This is located within the adminstrative area of Southend-on-Sea City Council.	N

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											Perkins who describes her use, and of others, being in full sight of the warden; that wildlife is never frightened by horses but are disturbed by dogs; that she wished to see 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						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.		

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											Rackham's ancient woodland book "The Woods of South-East Essex" the numerous double pecked tracks through the Reserve are recorded as "Road or woodland ride". The enclosed 1996 photo informs of a "Ride" closed for woodland work where tracks of vehicles are also very evident. (Encs. 2 copy letters and photo.) We also find it difficult to understand when the Reserve is fully within the boundary of Castle Point Borough that it is managed by Southend Council who have banned access to horse riders and cyclists. Especially when the book "Leigh-on-Sea - A history" by Judith Williams on Pg. 102 informs "In 1938 Southend purchased over 40 acres of Belfairs Great Wood in conjunction with Ben fleet Urban District Council and Essex County Council with the aim to create an						Riding ban conflicts with Forestry England March 2025 Access Review states horse riders will be able to enjoy hacking in 49 more woodlands across England without riders needing a permit. Request local riders to be able to enjoy reinstatement of riding access in the Nature Reserve within a very short time.		

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required	
											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									

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											previously had been unrecorded. 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 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								

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											numerous rides - the longest encircling the boundary passing 6 access points within which another 5 rides traverse in all directions. Further, the riding ban conflicts with Forestry England (the nation's largest land manager caring for 1500 woods and forests across England) when their March 2025 Access Review states horse riders will be able to enjoy hacking in 49 more woodlands across England without riders needing a permit, while still protecting sensitive 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								

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											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.								
0 3 6 0- 0 0 0 7	Organisatio n	Mar lene	Curt is	Britis h Horse Socie ty		Par a 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				See atta chm ent	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 house alone in the countryside and quiet places. Wildlife accept horse riders as harmless and remain undisturbed.	Noted.	N

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											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.		
0 3 6 0- 0 0 8	Organisatio n	Mar lene	Curt is	Britis h Horse Socie ty		Par a 12. 3			No		The second point of introducing further cycle routes ... north along ... Daws Heath Road to provide additional access to Belfairs Nature Reserve and West Wood, if West Wood's northern access adjacent the Ragwood Riding School is considered but the existing bridleway use is not included, we consider the Local Plan to be unsound. Regarding access for cyclists to the Nature Reserve, unless our Nature Reserve points above result in the inclusion of horse riders as				See atta chm ent	B	Routes along Daws Heath Road to Belfairs Nature Reserve and West Wood, should consider access to Ragwood Riding School and the existing bridleway. Access to the Nature Reserve should be for horse riders as well as cyclists.	Noted. Policy T3 seeks to support active travel routes, including those for recreation for walkers, cyclists and horse riders. Essex County Council as the Highways and Transportation Authority are responsible for the management of Public Rights of Way, including Bridleways.	N

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											well, we consider the Local Plan again to be unsound.								
0 3 6 0- 0 0 0 9	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		DH 1			No		Re No. 4 of "projects improving managed walking and cycling connections across the wider area will be supported", here again if horse riders are omitted from this Green Space Connectivity the Local Plan is considered to be unsound.				See atta chm ent	B	Re No. 4 of "projects improving managed walking and cycling connections across the wider area will be supported", here again if horse riders are omitted from this Green Space Connectivity the Local Plan is considered to be unsound.	A modification to policy DH1 point 4 is agreed to ensure the long history of equine activity in the area is protected.	Y
0 3 6 0- 0 0 1 0	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		Par a 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 atta chm ent	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	Noted. This paragraph is identifying the woodland around Daws Heath.	N

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																	Borough's Woods.		
0 3 6 0- 0 1 1	Organisatio n	Marl ene	Curt is	Britis h Horse Socie ty		T3					To help achieve rider's needs we enclose a copy of ECC's 2019 News Release pledging to improve and increase the number of bridleways in Essex, the action to be taken and their consideration for new bridleways in planning developments. A further option for improving access for riders is by fully implementing the historic Railway Map Survey for the Parish of Leigh in which 4 Public Bridleway Roads in the ownership of Surveyors of Highways and ors. are stated to exist but which today's landowner, the Salvation Army, currently does not recognise across their land. Finally, riders of Belfairs Wood Trotting Track and of West Wood bridleway have informed of constantly being chased by off-lead dogs. In a West Wood incident,				See atta chm ent	B	Existing public bridleway roads are not recognised. Riders of Belfairs Wood Trotting Track and West Wood Bridleway have informed of constantly being chased by off-lead dogs. County Code signs should be erected on all Bridleways.	Noted. Policy T3 seeks to support active travel routes, including those for recreation for walkers, cyclists and horse riders. Essex County Council as the Highways and Transportation Authority are responsible for the management of Public Rights of Way, including Bridleways.	N

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											two dogs chased a horse rider, then entered and continued chasing and pestering another horse in its paddock. We request that Country Code signs are erected on all Bridleways making clear the danger loose dogs cause to horses, riders and likely, if kicked, to the dogs themselves.								
0360-0012	Organisatio n	Marlene	Curtis	British Horse Society		T1	Not Stat ed	Thank you for your reminders for a response within the consultation extension. For the British Horse Society under option B) I submit the additional details to Point 12 (Achieving Riders' needs) in my initial 25 September 2025 reply. Here, re improving access for riders via the referred historic Railway map of 4 Public Bridleway Roads within the ownership of Surveyors of Highways and ors., I request the date of 1846 and reference No. QRU/m 2/56 lodged at the Essex Record Office (ERO) to be added. I also request the following details of a further 1845 Railway Map at ERO, Reference No. QRUM/2/51 to be added. Here 8 Public Bridlepaths are recorded existing within the Parish of Hadleigh and I O Bridlepaths within the Parish of Leigh together with 2 Occupation Roads and a Public Highway. In existing circumstances of the acute need for horse riders to							Atta che d seve ral new s clip ping s, ema ils and lette rs		Thank you for your reminders for a response within the consultation extension. For the British Horse Society under option B) I submit the additional details to Point 12 (Achieving Riders' needs) in my initial 25 September 2025 reply. Here, re improving access for riders via the referred historic Railway map of 4 Public Bridleway	Unclear how thses comments relate to CPBC Plan Policy T1. All CPBC mapping is ONS based. Essex County Council is the responsible authority and is the responsible Public Rights of Way Authority (including Bridleways) and also the Highways Authority.	N

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								be able to ride safely off-road to avoid RT As, the Castle Point Plan is considered unsound if it does not include the reinstatement of these BRs. Meanwhile, I confirm our previous response submitted was based on the correct version of the plan and the further copy requested is enclosed with our above extension response in the envelope provided.									Roads within the ownership of Surveyors of Highways and ors., I request the date of 1846 and reference No. QRU/m 2/56 lodged at the Essex Record Office (ERO) to be added. I also request the following details of a further 1845 Railway Map at ERO, Reference No. QRUM/2/51 to be added. Here 8 Public Bridlepaths are recorded existing within the Parish of Hadleigh and I O Bridlepaths within the Parish of Leigh together with 2 Occupation Roads and a Public Highway. In existing circumstances of the acute need for horse riders		

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																	to be able to ride safely off-road to avoid RTAs, the Castle Point Plan is considered unsound if it does not include the reinstatement of these BRs. Meanwhile, I confirm our previous response submitted was based on the correct version of the plan and the further copy requested is enclosed with our above extension response in the envelope provided.		
0 9 5 5- 0 0 0 1	Individual	Tom	Cushion		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 0 8 2- 0 0 0 1	Individual	Lorr aine	Cut hber tson		Not Stated	SP3	No	I do not believe the plan to be sound nor legally compliant. I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. • I understand that we have to have some development on Canvey Island but the proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. • The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. • North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Many of the reasons given in the CPBC report, issued last week, as to why NWT is not a suitable site	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	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stat ed		Yes, ECC Floo r Risk Con sult atio n	B - see 008 2- 000 3 to 000 5	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 implementati on pathways to address NPPF 180. Mitigation measure identiofied but theoreticalsal rather than practical. • Canvey: Concerns over flood risk. SUDS	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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								are relevant to Canvey Island which has the added issues of tidal flood risk and drainage issues. • The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024).			measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are						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.	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.	

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											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							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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											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								

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											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								

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											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								

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											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								

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											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.								

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											The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. I understand the West site of CI was not included in CP's Flood Risk Assessment (May 2025). The Council looked at 35 sites, West Canvey not among them and yet still allocated 2,700 homes for development to West Canvey. The 2015 Multi-Agency Partnership identified that Canvey needed major drainage investment before any significant development could proceed safely. Nearly a decade later, Anglian Water - has invested								

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											nothing in upgrading the island's capacity. Anglian Water has been fined this month for not maintaining its systems. So why do we think they are going to make any improvements to ours! It is claimed that Essex County Council, who are responsible for managing flood risk in our area, had 'endorsed CPBC plans to build the proposed 2700 home estate on Canvey Island.' A Freedom of information request was made to confirm this claim and ECC stated they had not been consulted on the West Canvey site. Please see attached which lists which information was requested and ECC's response. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North								

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											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,								

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											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								

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											understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased								

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											and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative									

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											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								

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											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								

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											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								

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											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								

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											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								

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											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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											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								

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											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								

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											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								

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											of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission								

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											to the Planning Inspectorate.								
0 0 8 2- 0 0 0 2	Individual	Lorr aine	Cut hber tson		Not Stated	For wor d	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-	No	Justified, Consistent with National policy			Not Stat ed		Yes, ECC Floo r Risk Con sult atio n	B - see 008 2- 000 3 to 000 5	• Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0 0 8 2- 0 0 0 3	Individual	Lorr aine	Cut hber tson			SP3	Not Stat ed		No	Not stated	West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness ¹ . West of Canvey Road is essential to the integrity of Canvey Island's landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against climate challenges. Reclassifying such a strategically					Non e	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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											important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF’s requirement to safeguard land from encroachment ² . 1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. “Land adjacent to settlement edge with reduced openness...” (p.40). “Fragmented ownership reduces contribution to Green Belt purposes.” (p.41). “Equestrian land considered less open.” (p.44). 2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances.								

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											Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances.								
0 0 8 2- 0 0 0 4	Individual	Lorr aine	Cut hber tson			SP3	Not Stat ed		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					Non e	Objects to the assessment and categorisatio n of East of Canvey Road (GB3). Provides evidence that it isn't Grey Belt.	Noted	N

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											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 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								

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											infrastructure.” (p.12). “Increased impermeable surfaces will exacerbate flood risk.” (p.23)."								
0 0 8 2- 0 0 0 5	Individual	Lorr aine	Cut hber tson			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					Non e	Objects to the assessment and categorisatio n of Land South of Charfleets (GB3). Provides evidence that it isn't Grey Belt.	Noted	N

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											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 treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong and dishonest to not classify all or if not significantly more of the site as ‘Grey Belt’ when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents. 1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. “Land adjacent to settlement edge								

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0 2 1 4- 0 0 0 1	Individual	Lyns ey	Cutt s		Not Stated	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a 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.	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	Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These 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	Not Stat ed		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	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA) .

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											acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to	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 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							to include green belt sites. • North West Thundersley should have been included.	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	

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											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	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 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												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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											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 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	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 deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.							

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											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								

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											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								

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											considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national								

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											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								

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											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								

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											designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West								

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											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								

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											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,								

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											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								

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											priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt								

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											site’s residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the								

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											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								

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											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,								

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											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.								
0 2 1 4- 0 0 0 2	Individual	Lyn ey	Cutt s		Not Stated	For wor d	No	While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. A key statutory requirement is the ‘Duty to Cooperate’. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities	No	Not Stated			Not Stat ed		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0 4 8 3 - 0 0 0 1	Individual	S	D Wat han		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy,	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No		Ado ptio n, Futu re revis ions	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the	N

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											for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure,							Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on	

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											protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							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	

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																		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. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic	

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																		Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing	

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																		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	

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																		Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0 9 1 5- 0 0 0 1	Individual	Cor al	Daly		Yes	SP3	No	Why has North West Thundersley not been included in your Plan	No	Justified, Consistent with national policy	The plan is based on the over development of Brownfield sites Why is North West Thundersley NOT included I live close to Hadleigh Castle and opposite the Salvation Army sites Castle Lane is a Lane NOT a road This area should be protected for the wildlife and heritage of this location	North West Thundersley MUST be included in your Plan This location is ideal for the number of housing required to meet local and government targets Infrastructure can be placed for schools - doctors - dentists and the sheer amount of traffic	No	Not Ans wer ed	Not Ans were d	A	North West Thundersley No building on HAD2	North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Policy HAD2 does not propose any built development.	N

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0 9 1 7- 0 0 0 1	Individual	Dan iel	Daly		Yes	SP3	No	North West Thundersley has NOT been included in your plan This site is ideal for a majority of housing which will not impact the local community in Hadleigh.	No	Justified, Consistent with national policy	North West Thundersley has NOT been included	There should be NO building works at all on the Salvation Army Land This is an historical site so close to Hadleigh Castle North West Thundersley	No	Not Ans wer ed	Not Ans were d		No building on Salvation Army Land North West Thundersley	HAD2 This policy does not propose any built development North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	N

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0 5 9 8 - 0 0 0 1	Individual	Haz el	Dani els		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 9 8 - 0 0 0 2	Individual	Haz el	Dani els		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 9 8 - 0 0 0 3	Individual	Haz el	Dani els		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
0 2 7 3- 0 0 0 1	Individual	Lyn ette	Dar can		Not Stated	Had 4	Not Stat ed	I am writing to formally register my strong objection to the proposed development of 114 houses on the above-mentioned land. I cannot understand how 114 houses can realistically fit within such a small space. This level of density would result in a minimum of 228 additional vehicles on the roads, most likely far more as families grow and children become drivers. The land simply cannot accommodate the necessary	Not Sta ted		Driving along Scrub Lane has become increasingly difficult, with parked cars, sleeping policemen, and congestion making travel slow and stressful. Many residents are forced to park outside garages in Seymour Road,	A much smaller number, in keeping with the character and infrastructure capacity of the area, would be far more appropriate. I urge the council to reject this application in its current form and to give proper consideration to the very real concerns of local people who will be directly and adversely affected.	Not Stat ed		No	B - see 027 3- 002	Objects to proposed housing on HAD4 Land South of Scrub Lane	Comments noted.	N

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								car parking spaces. Inevitably, the overspill will spread onto surrounding roads, worsening the existing congestion and further reducing air quality for current residents. We have already seen the impact of a smaller development in recent years. That change alone has created serious parking and traffic issues along Scrub Lane. Residents of those new houses now park on the road, restricting traffic flow and causing frequent jams.			across driveways, and even on green areas due to lack of available parking. Traffic in this area is already unsustainable. During rush hour (from 7:00am until around 9:30am), at school drop-off times, or when there are any accidents or roadworks in the surrounding area, Scrub Lane is gridlocked. This situation will only deteriorate with an influx of at least 500 new residents. Healthcare provision is another major concern. Residents already struggle to secure doctors' appointments, yet this development would place hundreds more people onto already overstretched registers. Whilst I acknowledge the need for additional housing, the proposed figure of 114 houses is wholly disproportionate for this location and shows little								

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											consideration for existing residents.								
0 2 7 3- 0 0 0 2	Individual	Lyn ette	Dar can		Not Stated	Had 4	Not Stat ed		Not Sta ted		Please give a thought to the residents and those that use these roads regularly. There is insufficient parking to accommodate 114 homes as I stated earlier. In fact, if the plot was used solely for parking it would not be able to accommodate 114+ cars! Where are the residents of those 114 dwellings going to park? What about their visitors? What about the health professionals? Where are the parents going to park to drop off their children to Hadleigh Infant School? During busy times or if there is any accidents in the area, Scrub Lane and surrounding roads are gridlocked which does not require the hinderance of another 114+ cars being parked		Not Stat ed		No	Non e	Objects to HAD4 because: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Infrastructure	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Infrastructure Infrastructure matters (including healthcare and education) are covered by	N

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											permanently in the area. Those that live here are already parking in front of the garages of Seymour Road to help the flow of traffic in the area. I can see this becoming a huge problem. Are residents expected to park on grass verges? Or struggle to park somewhere in the surrounding area? Or do you intend to create a one way parking or one way streets. Do you want us to become like Westcliffe where it is impossible to park and move around? Also, the traffic system in the area will need to be changed. In can take up to 15 mins during busy times to get out of Scrub Lane and a further 15 mins to get out at the lights by Morrisons. Creating lots of traffic fumes that local residents have to deal with. This is not right. Also, it is almost impossible to get a doctors							policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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											appointment, how are residents going to fare getting the medical help they need with another 114 (at least) people which are likely to require more than the usual care provided?								
0 1 1 3- 0 0 0 1	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	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 predetermine	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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

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											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 to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		

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0 1 1 3- 0 0 0 2	Individual	D	Darl ingt on		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 9 6 0- 0 0 0 1	Individual	Rich ard	Davi es		Yes	HA D4	Yes		No		The proposed development of this vast number of homes will add to an area that is already highly populated, increasing traffic in an already busy area. There also aren't the school places/doctors etc to support this, It will place too much pressure on an already busy area.	It will need to take into account the increase amount of traffic and pressure on public services.	Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Infrastructure Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.	N

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1 1 3 8- 0 0 0 1	Individual	Mari on	Davi es			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	<u>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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 3 8- 0 0 0 2	Individual	Mari on	Davi es			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 1 3 8- 0 0 0 3	Individual	Mari on	Davi es			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 2 3 3- 0 0 0 1	Individual	Dan iel	Davi es			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						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	this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 3 3-	Individual	Dan iel	Davi es			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 0 2								Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1 2 3 3- 0 0 0 3	Individual	Dan iel	Davi es			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 2 8 1- 0 0 0 1	Individual	Jean	Davi es			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 site selection strategy is biased and predetermined	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						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	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. <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	

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																	proposed 3316 urban homes for Canvey is not resident led	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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	

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																		Canvey SuDS options have been considered through the SFRA.	
1 2 8 1- 0 0 0 2	Individual	Jean	Davi es			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 2 8 1- 0 0 0 3	Individual	Jean	Davi es			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 7 2- 0 0 0 1	Individual	Hel en	Davi s		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based 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	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 Stat ed		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	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

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Para No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						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.		
0072-0002	Individual	Hel en	Davi s		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Justified, consistent with national policy			Not Stat ed		No		Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0073-0001	Individual	Joe	Davi s		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.	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 Stat ed		No		Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	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	N

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											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.						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	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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																	developme nt of Brownfield sites". Not all sites have been considered , no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersle y.		
0 0 7 3- 0 0 0 2	Individual	Joe	Davi s		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Justified, consistent with national policy			Not Stat ed		No		Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 1 2 4- 0 0 0 1	Individual	Adri an	Davi s		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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 predetermine d towards a "no greenbelt	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. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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.						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.	e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).
0 1 2 4-	Individual	Adri an	Davi s		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No	A	The number of Canvey West homes puts	Needs of emergency services considered in	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 0 2																	residents in the East at risk with emergency evacuation procedures	the supporting Infrastructure Delivery Plan (IDP).	
0 1 3 8- 0 0 0 1	Individual	Jane	Davis		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	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

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											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.						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.		Risk Assessment (SFRA).
0138-0002	Individual	Jane	Davis		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 8 4 4- 0 0 0 1	Individual	JAC QUE LINE	DAV IS		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", not considered all sites, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, and Hadleigh at 305. Total housing target of 11,000.	No	Not Ans wer ed	Not Ans were d	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. The Had2 policy is about protecting this greenbelt site as not suitable for development, but an unsound plan put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this policy Had2 with no housing development ever							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.	

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											on this farmland site. We need a C6 Policy for this farmland, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the	

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																		requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were	

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																		promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is	

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																		safeguarded by policy HAD5	
1 1 6 7- 0 0 0 1	Individual	Pete r	Davi s			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	No	Justified, Consistent with National Policy	We 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	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.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								and it has no credible five-year housing land supply.			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						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	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. <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	

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																	Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1 1 6 7- 0 0 0 2	Individual	Pete r	Davi s			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 1 6 7- 0 0 0 3	Individual	Pete r	Davi s			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1 1 6 8- 0 0 0 1	Individual	Eile en	Davi s			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	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 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> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 6 8- 0 0 0 2	Individual	Eile en	Davi s			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
1160003	Individual	Eileen	Davis			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0674001	Individual	Clair	Davis-Armstrong		Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Canvey Island lacks the infrastructure to accommodate the proposed development plan for an additional 3,316+ dwellings. First and foremost, this development would impose a significant burden on the roads for Canvey residents who require access to and from the Island. There is a single bottleneck entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams for extended periods, even in the absence of any incidents. Additionally, Canvey Island is already susceptible to	No further development should take place until an additional road is established as an alternative emergency exit from the Island. Should an alternative transportation link be developed, I see far less justification for resistance.	No	Not Answered	Not Answered		Canvey Island lack of infrastructure Third Road needed Flood Risk Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Third Road 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		N

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											flooding. This development would impose an intolerable burden on the current drainage system. Finally, the planning has failed to consider the need for additional amenities, which are already in high demand, such as additional medical practices, dental services, and new senior schools.							any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement	

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																		projects identified in the Local Transport Plan. Flood Risk Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the	

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																		form of the SFRA and IDP, including in relation to Canvey.	
0 6 7 4- 0 0 0 2	Individual	Clair e	Davi s- Arm stro ng		Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Canvey Island lacks the infrastructure to accommodate the proposed development plan for an additional 3,316+ dwellings. First and foremost, this development would impose a significant burden on the roads for Canvey residents who require access to and from the Island. There is a single bottleneck entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams for extended periods, even in the absence of any incidents.	No further development should take place until an additional road is established as an alternative emergency exit from the Island. Should an alternative transportation link be developed, I see far less justification for resistance.	No	Not Answered			Canvey Island lack of infraststructu re Third Road needed Flood Risk	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Third Road 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	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Additionally, Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system. Finally, the planning has failed to consider the need for additional amenities, which are already in high demand, such as additional medical practices, dental services, and new senior schools.							be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a	

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																		contribution to relevant transport improvement projects identified in the Local Transport Plan. Flood Risk Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4,	

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																		SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	
0 6 7 4- 0 0 0 3	Individual	Clair e	Davi s- Arm stro ng		Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Canvey Island lacks the infrastructure to accommodate the proposed development plan for an additional 3,316+ dwellings. First and foremost, this development would impose a significant burden on the roads for Canvey residents who require access to and from the Island. There is a single bottleneck entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams for extended periods, even in the absence of any incidents.	No further development should take place until an additional road is established as an alternative emergency exit from the Island. Should an alternative transportation link be developed, I see far less justification for resistance.	No	Not Ans wer ed			Canvey Island lack of infraststructu re Third Road needed Flood Risk	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Third Road 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	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Additionally, Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system. Finally, the planning has failed to consider the need for additional amenities, which are already in high demand, such as additional medical practices, dental services, and new senior schools.							be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a	

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																		contribution to relevant transport improvement projects identified in the Local Transport Plan. Flood Risk Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4,	

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																		SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	
0674-0004	Individual	Clair e	Davis-Armstrong		Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Canvey Island lacks the infrastructure to accommodate the proposed development plan for an additional 3,316+ dwellings. First and foremost, this development would impose a significant burden on the roads for Canvey residents who require access to and from the Island. There is a single bottleneck entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams for extended periods, even in the absence of any incidents.	No further development should take place until an additional road is established as an alternative emergency exit from the Island. Should an alternative transportation link be developed, I see far less justification for resistance.	No	Not Answered			Canvey Island lack of infrastructure Third Road needed Flood Risk	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Third Road 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	N

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											Additionally, Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system. Finally, the planning has failed to consider the need for additional amenities, which are already in high demand, such as additional medical practices, dental services, and new senior schools.							be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a	

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																		contribution to relevant transport improvement projects identified in the Local Transport Plan. Flood Risk Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4,	

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																		SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	
0089-0001	Individual	Alan	Dawes		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible fiveyear housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF 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",	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	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	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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											has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large						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	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.	SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											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.						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.		
0 0 8 9- 0 0	Individual	Alan	Daw es		Yes	B8	No	This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy	No	Justified,	CPBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment		No		No		This B8 policy is not evidence based, as I believe there has been poor	Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial	N

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0 2								is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE.			space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC’sOfficers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading						engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. CPBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodat ed on Canvey. ECC will relay objections in that any residential units near protected	building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	

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											Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.						facilities will undoubtedly increase noise complaints. CPBC's Office Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification		

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																	for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.		
0 4 0 0 - 0 0 0 1	Individual	Paul	Daw es		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental,	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No			A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate,	N

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											recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open							sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land	

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											space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver	

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																		against new housing targets. In the first ten years of the plan the Council’s aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.	

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																		Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several	

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																		clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green	

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																		Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0 6 3 5- 0 0 0 1	Individual	Paul	Daw es		Yes	SP3	No	Sounds very complicated	No	Positively prepared	Over development on Canvey Island, no mention of additional infrastructure eg 3rd road off Canvey Island.	Scale back on 3000+ housing and build a 3rd access road to Canvey Island.	No	Not Ans wer ed	Not Ans were d		Need a third road on to Canvey	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access	N

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

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																		Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
1 2 6 0- 0 0 1	Individual	Jani ce	Daw kins			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy",	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						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	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. <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	

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																		(Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. 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.	
1 2 6	Individual	Jani ce	Daw kins			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the									Policy HOU5 should make provision for	Comments noted. Policy HOU5 does not	N

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0- 0 0 0 2								HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									improved site environment for the local residents	restrict improvement to the sites environment	
1 2 6 0- 0 0 0 3	Individual	Jani ce	Daw kins			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 2 6 7- 0 0 0 1	Individual	Amy	Daw son		Not Stated	SP3	No	To Whom It May Concern, I wish to express my objection to the Castle Point Plan Regulation 19 Draft, which I believe is non-compliant due to its failure to adequately consider alternative, potentially more strategic, locations for housing development. The proposed site selection appears to disregard the updated National Planning Policy Framework (NPPF) guidance on greenbelt and grey belt land.	Not Sta ted	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,	I urge the Council to consider more balanced alternatives, such as North West Thundersley, which could meet housing needs without placing undue pressure on urban and environmentally sensitive areas. Please take into account the limited conservation and green spaces remaining on Canvey Island, and the long-term impact this plan may have on infrastructure and wildlife.	No	Not Stat ed	No	A	* Fails to consider all alternative locations for housing development. * Disregards the updated National Planning Policy Framework (NPPF) guidance on greenbelt and grey belt land. * The plan disproportionately targets Canvey Island for development, despite significant	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Green Belt/Grey belt covered under policy GB2. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP,	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 infrastruc

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											drainage, sewage, and flood risk.						infrastructure constraints. Overdevelop ment 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 environmenta lly 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.	including in relation to Canvey. North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 3 2 6- 0 0 0 1	Individual	Ros s	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 North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not	PROPOSED MODIFICATION: Add North West Thundersley site.				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 strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the	Grey belt covered under policy GB2. SLAA and SA considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley 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	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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											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". 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	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).	

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	the East at risk with emergency evacuation procedures.		
0 3 2 6- 0 0 0 2	Individual	Ros s	Day			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not stated						A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 3 5 1- 0 0 0 1	Individual	Jade	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 North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of	PROPOSED MODIFICATION: Add North West Thundersley site.				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. • North West Thundersley should have been included. • Canvey: Concerns	• 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 • North West Thundersley : Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						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.	was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy 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.	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
0351-0002	Individual	Jade	Day			C4	No	. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Not Stated							A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0331-0001	Organisation	Elaine	De Can	Canvey Island Town Council		Whole Plan		Following a meeting of the Town Council on the 17th September 2025, I am writing to advise that upon consultation of the local plan the council RESOLVED 8 votes for with 1 against that the proposed plan is unsound for the following reasons and points in relation to the corresponding policy numbers within the consultation: Members raised the following points in relation to policy number SP3: The plan does not take into consideration the views of residents and the proposal for an additional 3300 homes on Canvey Island will overdevelop an existing heavily urbanised area, which is at maximum capacity. The additional residents that these homes will introduce will impact the overall safety of the island and put additional pressure on an existing inadequate policing provision. Canvey Island has two COMAH sites with no clear emergency plan, and an increase in development creating a larger population will further impede attempts to exit the island in an emergency with the							A	The Plan is Unsound. Members raised the following points in relation to policy number SP3: • The plan does not take into consideration the views of residents and the proposal for an additional 3300 homes on Canvey Island will overdevelop an existing heavily urbanised area, which is at maximum capacity. • The additional residents that these homes will introduce will impact the overall safety of the	Noted Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Protection of wildlife is a key consideraion in the Plan as set out in teh Environment chapter Needs of	Yes - Mods set out in the schedule , including to C1 and ENV3 sections	

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								existing inadequate road infrastructure in place. Members raised concerns that the addition of such a large number of homes will cause an increase in vehicles, which the current insufficient road infrastructure cannot support. Canvey Island is a flood zone 3a, which is the highest probability of flooding, and is already heavily urbanised with limited green spaces. Any use of remaining green belt land for development will add to the already high flood risk and could impact the overall safety of residents. Members raised the following point in relation to policy number ENV3: • Concerns that proposed development sites may not have taken into consideration the protection of local wildlife. Members raised the following points in relation to policy numbers C1 and C10: • The proposed development of some brownfield sites will limit and reduce much needed parking facilities for local shops and visitors. Members raised the following points in relation to policy number C3: • There is a concern that the presence of the two COMAH sites within the C3 policy area already poses a threat of terrorism due to the nature of the sites, therefore, increasing development in this area raises concerns that any												island and put additional pressure on an existing inadequate policing provision. • Canvey Island has two COMAH sites with no clear emergency plan, and an increase in development creating a larger population will further impede attempts to exit the island in an emergency with the existing inadequate road infrastructure in place. • Members raised concerns that the addition of such a large number of homes will cause an increase in vehicles, which the current insufficient road infrastructure	emergency services considered in the supporting Infrastructure Delivery Plan (IDP). 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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								need for evacuation in the event of an emergency or terrorist incident will become unsustainable. Members raised the following points in relation to policy number HOU3: • Members noted that Canvey Island has an existing growing community, and concerns were raised that further development will bring an unsustainable influx of residents and the types of homes being proposed, are not affordable and primarily aimed at the local community.									cannot support. • Canvey Island is a flood zone 3a, which is the highest probability of flooding, and is already heavily urbanised with limited green spaces. Any use of remaining green belt land for development will add to the already high flood risk and could impact the overall safety of residents. Members raised the following point in relation to policy number ENV3: • Concerns that proposed development sites may not have taken into consideration the protection of local wildlife. Members raised the		

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																	following points in relation to policy numbers C1 and C10: • The proposed development of some brownfield sites will limit and reduce much needed parking facilities for local shops and visitors. Members raised the following points in relation to policy number C3: • There is a concern that the presence of the two COMAH sites within the C3 policy area already poses a threat of terrorism due to the nature of the sites, therefore, increasing development in this area raises concerns that any need for evacuation in the event of		

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																	an emergency or terrorist incident will become unsustainabl e		
0 1 2 7- 0 0 0 1	Individual	Jack	Deal		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	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. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site

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											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.							predetermine d 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.	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.	circumst ances, landscap e character and the green- blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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0 1 2 7- 0 0 0 2	Individual	Jack	Deal		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 7 9 9- 0 0 0 1	Individual	Mic hael	Dea rson		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 1 1 1- 0 0 0 1	Individual	Sian	Deb enh am		Yes	Wh ole Pla n	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound I consent to my full name being published alongside my comments for this consultation.	Yes				Not Stat ed		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 9 8 2- 0 0 0 1	Individual	Edw ard	Dela hay e		Yes	SP3	No	Did not consider strategic alternatives such as North-west Thundersley. The 5 year housing land supply appears not to be credible.	No	Justified, Consistent with national policy	It is not consistent with national policy - it does not meet the housing target for Castle Point and the site selection ignores Green Belt / Grey Belt against NPPF guidelines. It is not justified because the site selection is based on a strategy of "no buildings on Green Belt " and the brownfield sites appear to be over-developed, resulting in the area of North-west Thundersley being excluded. I agree with the policy and stated objectives relating to the Hadleigh farm area and also, in my opinion, given the UK is not self-sufficient in food production, it cannot afford to lose viable farm land for housing. Additionally, any development south of the A13 road would have a detrimental effect upon a main road already over-	Add North-west Thundersley to the plan. This area of 187 hectares, a mixture of Green Belt and Grey Belt, is capable of providing several thousand homes and its use would help prevent increasing the housing density of other areas in Castle Point. It use would provide a housing figure closer to the government target.	No	Not Ans wer ed	Not Ans were d		Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											burdened with traffic for long periods during the working day. I also agree that the Had2 policy is about protecting this Green Belt site from development. The unsound plan for 6200 homes puts the Hadleigh farm at risk of speculative development which unless planning objections prevail would cause urban spawl. Any development of the farmland would also adversely affect the neighbouring area of Leigh-on-Sea. The area would benefit from a C6 policy (Green lung) to protect and and enhance a green asset between Hadleigh and Leigh-on-Sea. Any development of this area would reduce wildlife protection and open spaces and its proximity to Hadleigh Castle would be													provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government’s Standard method. However, once a new plan is place, the housing target is set by that plan	

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											profoundly detrimental.							and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery	

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																		again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North	

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																		West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the	

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																		natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a	

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																		site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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1 1 6 2- 0 0 0 1	Individual	Mau reen	De meri ng			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	<u>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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 6 2- 0 0 0 2	Individual	Mau reen	De meri ng			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 1 6 2- 0 0 0 3	Individual	Mau reen	De meri ng			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 5 6 1 - 0 0 0 1	Individual	Shei la	Den ham		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase							progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council’s aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle	

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											the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not	

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																		preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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																		value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review	

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

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

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																		identified in the Local Transport Plan.	
0 5 6 1 - 0 0 0 2	Individual	Shei la	Den ham		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however	N

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											provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.						for local residents	included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes.	

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																		Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 6 1 - 0 0 0 3	Individual	Shei la	Den ham		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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											on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.								
0 1 5 4- 0 0 0 1	Individual	Ann ema rie	Den nis		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.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	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, landscape character and the green-blue infrastructure network, and have regard to Essex County	Y - Policy SD3(3) 3. Proposal s 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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											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.						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.	Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0 1 5 4- 0 0 0 2	Individual	Ann ema rie	Den nis		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0 2 1 7- 0 0 0 1	Individual	Stev e	Des boro ugh		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	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	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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											appropriate for Canvey Island's unique geography and drainage infrastructure.						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.	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.	
0 2 1 7- 0 0 0 2	Individual	Stev e	Des boro ugh		Yes	C4	No	The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 0 2 9- 0 0 0 1	Individual	Joha nne	Dev erric k		Yes	Wh ole Pla n	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness' , as set out in the National Planning Framework	Yes				Not Stat ed		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0 2 7 9- 0 0 0 1	Individual	Jane	Dext er		Not Stated	SP3	Yes	Dear Cllr Dave Blackwell, I am a resident of Castle Point and fully support the Plan's proposal to preserve our Green belt. I agree that new homes should be built on brownfield site's within the borough and the relevant infrastructure	Yes				Not Stat ed		No	A	Fully support the Plan's proposal to preserve our Green belt. I agree that new homes should be	Support noted.	N

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								improvements should be made to support the increase in traffic/ population. Kind regards, Jane Dexter Sent from my iPhone									built on brownfield site's within the borough and the relevant infrastructure improvements should be made to support the increase in traffic/ population.		
0 5 7 2 - 0 0 0 1	Individual	Susan	Dillon		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a	5YHLS 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.	N

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											West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled,						third road to be included in the plan.	It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year	

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											house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why	

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																		North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoin t.gov.uk/emerge ncyplanning/ Third Road 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	

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

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																		transport improvement projects identified in the Local Transport Plan.	
0 5 7 2 - 0 0 0 2	Individual	Susan	Dillon		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however	N

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											provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.						for local residents	included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes.	

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																		Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 7 2 - 0 0 0 3	Individual	Susan	Dillon		Yes	For eword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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											on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.								
1 3 8 4- 0 0 0 1	Individual	S	Dillon			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 3 8 4- 0 0 0 2	Individual	S	Dillon			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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond to the site circumst ances, landscap e character and the green-blue infrastruc ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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																		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.	

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																		North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of	

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																		the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us	

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																		would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to	

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																		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.	
1 3 8 4- 0 0 0 3	Individual	S	Dillo n			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 3 7 6- 0 0 0 1	Individual	Jane t	Dina line			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.								
1 3 7 6- 0 0 0 2	Individual	Jane t	Dina line			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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											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.							important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land	and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley	

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																		was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing	

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																		flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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																		Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 7 6- 0 0 0 3	Individual	Jane t	Dina line			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0 7 6 6- 0 0 0 1	Individual	Terr i	Dine s		Yes	SP3	No	Failed to consider other alternatives, for example North West Thundersey. No creditible 5 year housing supply	No	Justified, Consistent with national policy	The draft local plan is not justified with national policy. It doesn't meet the housing target for Castle Point. The site selected ignores the green/grey belt against new NPPF guidelines. the plan is not justified. The site selection strategy is biased and predetermined towards a "no greenbelt policy" Site selection is based on the overdevelopment of Brownfield sites. Not all sites considered, no green/grey belt sites added and with the exclusion of North West Thundersley. NPPF guidelines state development should be direct away from areas at high risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 urban homes for Canvey in not	North West Thundersley site. 187Ha A greenbelt Brownfield site option for 7500 homes and reduce the urban hosuing target from 6200 to 3500 with Canvey at 1050.	No	Not Ans wer ed	Not Ans were d	A	Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											resident led. Canvey west homes puts residents in the East of Canvey at risk with emergency evacuation procedures.							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.	

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																		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	

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																		capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is	

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																		deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development	

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																		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.	

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1 4 1 3- 0 0 0 1	Individual	Beryl	Disney		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.	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 1 050, Hadleigh at 305. Total housing target of 11 ,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt	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	N

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																		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.	

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																		North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the	

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																		requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were	

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1 4 1 3- 0 0 0 2	Individual	Beryl	Disney		Yes	Had 2	Not Stated	I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation	Not Stated		I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh	We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.	No				Support for policy HAD2 but concern that the plan for over 6000 homes puts this site at risk for	Support noted. Should the plan be adopted this will safeguard from speculative development.	N

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								and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.			farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.						speculative development		

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1 4 1 4- 0 0 0 1	Individual	Alan	Disney		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.	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 1 050, Hadleigh at 305. Total housing target of 11 ,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt	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	N

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																		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.	

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																		North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the	

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																		requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were	

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																		promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	
1 4 1 4- 0 0 0 2	Individual	Alan	Disney		Yes	Had 2	Not Stated	I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation	Not Stated		I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh	We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.	No				Support for policy HAD2 but concern that the plan for over 6000 homes puts this site at risk for	Support noted. Should the plan be adopted this will safeguard from speculative development.	N

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								and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.			farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.						speculative development		
0 6 4 6- 0 0 0 1	Individual	Jacq ueli ne	Dixo n		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant.	Support noted.	N
0 7 1	Individual	Laur enc e	Dixo n		Yes	Wh ole	Yes		Yes				No	Not Ans	Not Ans	A	Castle Point Plan is sound	Support noted.	N

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7- 0 0 0 1						Pla n								wer ed	were d		and legally compliant,		
0 7 7 0- 0 0 0 1	Individual	Dan	Dixo n		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 7 1- 0 0 0 1	Individual	Kati e	Dixo n		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 7 9 7- 0 0 0 1	Individual	Sop hie	Dixo n		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 8 9 1- 0 0 0 1	Individual	Stac ey	Dixo n		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d		Castle Point Plan is sound and legally compliant,	Support noted.	N
0 0 5 0- 0 0 0 1	Individual	Wen dy	Dod ds		Yes	Wh ole Pla n	Yes	Dear Sir/Madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stat ed		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

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0 0 5 2- 0 0 0 1	Individual	Gra ham	Dod ds		Yes	Wh ole Pla n	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stat ed		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0 7 9 6- 0 0 0 1	Individual	Kat heri ne	Dol phin		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 6 1 8 - 0 0 0 1	Individual	Jean	Doo lan		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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																		above. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoin t.gov.uk/emerge ncyplanning/ Third Road 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.	

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

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant ?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0618-0002	Individual	Jean	Doolan		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	N	

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 6 1 8 - 0 0 0 3	Individual	Jean	Doo lan		Yes	For ewo rd					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	

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0 5 4 3 - 0 0 0 1	Individual	Joyce	Dou ghty		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS 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	N

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											East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of							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.	Strategic

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											Canvey's residents are of the same opinion.							alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). 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	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out	

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

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

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0 5 4 3 - 0 0 0 2	Individual	Joyc e	Dou ghty		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the 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).	N

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																		the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0 5 4 3 - 0 0 0 3	Individual	Joyce	Doughty		Yes	For eword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22	N

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											homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.							consultation statement.	
1 3 3 7- 0 0 0 1	Individual	Joyce	Doughty			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											the overall site environment for the local residents.								
1 3 3 7- 0 0 0 2	Individual	Joyce	Doughty			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	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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 .	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	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 Assessm

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											proposed 3316 urban homes for Canvey is not resident led.							5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further	ent (SFRA).

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																		information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt	

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																		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 highway network in and around Castle Point, Evidence	

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																		of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk	

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																		Assessment (SFRA), 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.	
1 3 3 7- 0 0 0 3	Individual	Joyce	Doughty			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 4 3 8 - 0 0	Individual	Terrance	Dowdall		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0 1																			
0 8 8 3- 0 0 0 1	Individual	Clair e	Dow nha m		Yes	Wh ole Pla n	Yes		Yes				Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0 1 0 5- 0 0 0 1	Individual	Soni a	Dow sett		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,	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	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the

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											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						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	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.	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 residential homes.						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.		
0 1 0	Individual	Soni a	Dow sett		Yes	C4	No	The number of Canvey West homes puts residents in the	No	Not Stated			No		No	A	The number of Canvey West homes	Needs of emergency services	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
5-0002								East at risk with emergency evacuation procedures.									puts residents in the East at risk with emergency evacuation procedures	considered in the supporting Infrastructure Delivery Plan (IDP).	
067-0001	Individual	Toni	Dowsett		Yes	SP3	Yes		No	Consistent with national policy	Canvey Island lacks the infrastructure to support this proposed development plan for another 3.5k new dwellings. This development would impose a significant burden on the roads for Canvey residents who require access to and from Canvey Island. There is a single bottleneck entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams for extended periods, even in the absence of any incidents. ☒ Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current		No	Not Answered	Not Answered	A	Third road onto Canvey Flooding on Canvey Lack of Infrastructure Third Road 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	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											drainage system. Additional amenities have not been considered, including extra medical practices, dental services, and new senior educational institutions. Suggestion No further development should take place until an additional road is established as an alternative emergency exit from the Island.							those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	

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																		Flood Risk Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in	

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																		relation to Canvey.	
0 3 9 4 - 0 0 0 1	Individual	June	Dra per		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy,	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No			A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the	N

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											for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure,							Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on	

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											protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							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	

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																		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. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic	

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																		Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing	

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																		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	

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																		Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0 1 6 7- 0 0 0 1	Individual	Vivi en	Dre wer		Not Stated	SP3	Not Stat ed	Hi Very pleased to see that no green or grey belt land will not be built on. We must protect our environment, we need the trees to breathe and woods, fields and green spaces for wild life. Benfleet in particular doesn't have the infrastructure	Not Sta ted				Not Stat ed		No		Very pleased to see that no green or grey belt land will not be built on. We must protect our	Support norted.	N

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								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.									environment, we need the trees to breathe and woods, fields and green spaces for wild life. Benfleet in particular doesn't have the infrastructure to cope with over development. We put our trust in our local council and I think under all the pressure they are so under for development they have been strong enough to have saved our green belt.		
0 9 5 0- 0 0 0 1	Individual	Joh n	Dris coll		Yes	Wh ole Pla n	Yes		Yes	Positively prepared, Effective, Justified	The plan is in keeping with what the local area needs and with the wishes of the vast majority of the residents of the borough.	No modifications required	Not Ans wer ed	Not Ans wer ed	Not Ans were d	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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1 2 0 7- 0 0 1	Individual	Mar y	Dru mm ond			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	<u>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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 2 0 7- 0 0 0 2	Individual	Mar y	Dru mm ond			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 2 0 7- 0 0 0 3	Individual	Mar y	Dru mm ond			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0 0 6 1- 0 0 0 1	Individual	Coli n	Duff		Not Stated	SP3	No	Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory 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	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	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stat ed		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.	• 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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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								fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation 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			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							Mitigation measure identiofied but theoreticsal rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understandin g of Canvey’s unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA.	and the Castle Point Strategic Flood Risk Assessm ent (SFRA).

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								with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning 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,			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										Comments noted.	

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								the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly 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,			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								

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								justified, and in the public interest.			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								

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											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								

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											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								

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											development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of								

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											Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable								

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											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								

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											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								

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											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								

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											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									

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											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								

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											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								

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											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									

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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, 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								

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											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								

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											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								

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											not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission								

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											to the Planning Inspectorate.								
0 0 6 1- 0 0 0 2	Individual	Coli n	Duff		Not Stated	For wor d	No	A key statutory requirement is the ‘Duty to Cooperate’. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point’s case, the absence of clear and binding agreements on cross-	No	Not Stated			Not Stat ed		No	A	• Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0 1 8 5- 0 0 0 1	Individual	Sam anth a	Duff ield		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	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

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											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.						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.		Risk Assessm ent (SFRA).
0 1 8 5- 0 0 0 2	Individual	Sam anth a	Duff ield		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 1 9 1- 0 0 0 1	Individual	Mar k	Duff ield		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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		No	A	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	Y - Policy SD3(3) 3. Proposal s must demonstr ate how the SuDS feature(s) reflect and respond

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											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.							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	policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	risk with emergency evacuation procedures.		
0 1 9 1- 0 0 0 2	Individual	Mar k	Duff ield		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0 1 9 2- 0 0 0 1	Individual	Alys sa	Duff ield		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.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stat ed		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	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, landscape character and the green-blue infrastructure network, 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 Essex County

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											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.						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.	Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0 1 9 2- 0 0 0 2	Individual	Alys sa	Duff ield		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stat ed		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
1 3 4	Individual	Trac y	Duf oss e			Hou 5					The Hou5 Policy states, new park homes will only be		No				Policy HOU5 should make provision for	Comments noted. Policy HOU5 does not	N

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4- 0 0 0 1											supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.						improved site environment for the local residents	restrict improvement to the sites environment	
1 3 4 4- 0 0 0 2	Individual	Tracy	Dufosse			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	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	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 five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt 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	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	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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											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.						infrastructure .	housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these	Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal	

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																		(Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets	

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																		in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate	

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																		development site for those reasons set out above. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), 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.	
1 3 4 4- 0 0 0 3	Individual	Tracy	Duffosse			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	living at East Canvey		
0 9 4 9- 0 0 0 1	Individual	Clair e	Du mon tier		Yes	HA D4	Yes	N/A	No	Consistent with national policy	We write to object to the proposed allocation of at least 114 dwellings on Land South of Scrub Lane (Policy HAD4) in the Draft Castle Point Plan (Regulation 19, 2025). I believe the proposal conflicts with national planning policy (NPPF, 2024), UK environmental legislation (Environment Act 2021), and Castle Point's own strategic and place-based policies. For the reasons set out below, the allocation should be refused or substantially modified. . Overdevelopment and Density Policy HAD4 allocates at least 114 homes on a site of approximately one hectare. This represents an excessively high density for a greenfield edge-of-settlement location.	Withdraw the proposed development o the green space south of scrub lane. Please see all above comments.	Yes	Not Ans wer ed	Not Ans were d	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Green Belt	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further	N

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											Castle Point Policy SP2 (“Making effective use of urban land and creating sustainable places”) requires density targets to reflect the characteristics of different areas. The Scrub Lane site lies on the urban edge of Hadleigh, adjacent to open countryside, and such an intensive scheme would undermine local character. NPPF Paragraphs 119–120 require efficient land use, but emphasise that development density must reflect the prevailing character and setting. This allocation does not respect those principles and risks creating cramped, poor-quality living environments. --- 2. Loss of Green													details. Green Belt This land is not allocated as Green Belt	

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											Land and Environmental Value The site is presently open green land providing important ecosystem services — biodiversity, carbon sequestration, flood absorption, and landscape character. Castle Point Policy SP1 (“Supporting an enhancement of the Borough’s green spaces”) requires the protection and enhancement of green space. HAD4 would result in its permanent loss. NPPF Paragraphs 179–180 require policies and decisions to protect and enhance valued landscapes and biodiversity, to deliver net gains, and to maintain ecological networks. Under the Environment Act									

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											2021, development must provide a minimum 10% Biodiversity Net Gain. With such intensive use, it is unclear how HAD4 could achieve this without substantial off-site measures. --- 3. Infrastructure Capacity Development of 114 dwellings would generate significant additional demand on local infrastructure, services, and utilities. Castle Point Policy SP4 ("Development contributions") requires that new development must provide adequate contributions to education, healthcare, transport, and utilities. No clear mitigation strategy has been presented for HAD4.								

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											NPPF Chapter 8 requires planning decisions to ensure sufficient provision of community facilities and services. Schools, GP surgeries, and local roads in Hadleigh are already under pressure and risk being overburdened. --- 4. Flood Risk and Drainage Castle Point is particularly vulnerable to flood risk, and development on greenfield sites can exacerbate surface water flooding. NPPF Paragraphs 167–169 (Chapter 14) require development to be directed away from areas at highest flood risk, and to provide robust mitigation including sustainable drainage systems									

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											(SUDS). The Castle Point Plan’s policies on climate resilience (SD1–SD3) similarly require comprehensive flood mitigation and sustainable drainage. HAD4 does not provide adequate assurances in this respect. --- 5. Design Quality and Local Character High-quality design is a core principle of sustainable development. The Castle Point Residential Design Guidance (2013) requires adequate space standards, privacy, amenity space, landscaping, and parking provision. A scheme of 114 dwellings on this site is unlikely to comply with these requirements. NPPF Paragraph								

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

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											boundaries should be altered only in exceptional circumstances. Protecting openness and preventing urban sprawl are fundamental. The HAD4 allocation does not demonstrate exceptional justification. Even if not formally designated, the site contributes to the openness and character of Hadleigh’s edge and should be safeguarded. --- 7. Legal and Policy Inconsistencies The allocation conflicts with Castle Point Strategic Policies SP1, SP2, and SP4, as well as HAD4’s own requirement to deliver sustainable and context-appropriate growth. It conflicts with the NPPF (2024)								

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

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											infrastructure. It fails the tests of soundness set out in the NPPF (positively prepared, justified, effective, consistent with national policy). For these reasons, I respectfully urge Castle Point Borough Council to remove or substantially amend Policy HAD4 from the Draft Plan.								

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0 7 2 5- 0 0 0 1	Individual	Jane t	Dun ford		Yes	C4	No	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 mere technicality; it is a fundamental test of the Plan's soundness and credibility. Policy SP3 fails to establish a deliverable five-year supply of housing land—whether measured against the Government's housing targets or the Council's own lower assessed need. The absence of a transparent, evidenced, and up-to-date supply not only undermines the Plan's justification but also leaves all of Castle Point's Green Belt—land which may come under pressure for development—critically exposed to speculative proposals,	No	Consistent with national policy	Flood Risk and Inadequate Drainage - The proposed development of 3,143 homes is located within Flood Zones 2 and 3, areas with a high probability of flooding as defined by the Environment Agency. - Two major hazard sites—Calor Gas and Oikios—are situated nearby, compounding risk in the event of flooding or emergency evacuation. - The 2013/14 internal flooding event demonstrated the island's vulnerability. Following that event, the official report recommended that all drains be properly maintained to mitigate recurrence. - The 2017 Technical Report on Canvey Lake confirmed that the drainage system is inadequate for current and future	The proposed Canvey Island development contradicts the principles of sustainable development under the NPPF, which mandates that safety, resilience, and flood risk must be primary considerations. Proceeding without a full flood assessment and infrastructure plan exposes residents, businesses, and emergency services to unacceptable risk. A geological survey, of the site, transport links improved along with road infrastructure. Build in North West Thundersley	Yes	Not Ans wer ed	Not Ans were d	C	Five Year Housing Land Supply Flood Risk on Canvey Oil and Gas causing threat to safety No Flood Risk Assessment Air Quality North West Thundersley should be built on instead	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	N

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								including on sites that are environmentally sensitive or constrained by inadequate infrastructure. Flood Risk and Inadequate Drainage • The proposed development of 3,143 homes is located within Flood Zones 2 and 3, areas with a high probability of flooding as defined by the Environment Agency. • Two major hazard sites—Calor Gas and Oikios—are situated nearby, compounding risk in the event of flooding or emergency evacuation. • The 2013/14 internal flooding event demonstrated the island’s vulnerability. Following that event, the official report recommended that all drains be properly maintained to mitigate recurrence. • The 2017 Technical Report on Canvey Lake confirmed that the drainage system is inadequate for current and future capacity. • The Local Plan’s technical assessment itself acknowledges that “special drainage is critical for Canvey because it is a low-lying area vulnerable to climate change.” • Independent flood experts have stated that every assessed site on Canvey has a “high probability of flooding.” • Planning law and the National Planning Policy Framework (NPPF) require that local authorities: “Locate development in areas			capacity. • The Local Plan’s technical assessment itself acknowledges that “special drainage is critical for Canvey because it is a low-lying area vulnerable to climate change.” • Independent flood experts have stated that every assessed site on Canvey has a “high probability of flooding.” • Planning law and the National Planning Policy Framework (NPPF) require that local authorities: “Locate development in areas of lowest flood risk and demonstrate there are no reasonable alternatives before permitting building in Flood Zones 2 or 3.” No comprehensive Flood Risk Assessment (FRA) has yet been completed for these sites. 2. Infrastructure and Transport Capacity • The existing road network is severely constrained, with							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.	

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								of lowest flood risk and demonstrate there are no reasonable alternatives before permitting building in Flood Zones 2 or 3.” No comprehensive Flood Risk Assessment (FRA) has yet been completed for these sites. 2. Infrastructure and Transport Capacity • The existing road network is severely constrained, with both access roads leading to a single congested roundabout. • No clear transport improvement plan or confirmed funding mechanism has been provided to address increased traffic volumes from the proposed development. • The absence of robust infrastructure planning raises significant safety, access, and evacuation concerns, particularly during flood events. 3. Alternative and Safer Development Sites • The North Benfleet site offers a safer and more sustainable alternative, as it is not within a flood zone. • A potential link to the A127 could be incorporated into the planned junction upgrade, and Essex County Council draft plans demonstrate the feasibility of this connection. • The current plan prioritizes green belt and grey belt preservation over public safety and flood resilience, contrary to planning policy that requires flood risk and infrastructure adequacy to take precedence.			both access roads leading to a single congested roundabout. • No clear transport improvement plan or confirmed funding mechanism has been provided to address increased traffic volumes from the proposed development. • The absence of robust infrastructure planning raises significant safety, access, and evacuation concerns, particularly during flood events. 3. Alternative and Safer Development Sites • The North Benfleet site offers a safer and more sustainable alternative, as it is not within a flood zone. • A potential link to the A127 could be incorporated into the planned junction upgrade, and Essex County Council draft plans demonstrate the feasibility of this connection. • The current plan										Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in	

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								The proposed Canvey Island development contradicts the principles of sustainable development under the NPPF, which mandates that safety, resilience, and flood risk must be primary considerations. Proceeding without a full flood assessment and infrastructure plan exposes residents, businesses, and emergency services to unacceptable risk.			prioritizes green belt and grey belt preservation over public safety and flood resilience, contrary to planning policy that requires flood risk and infrastructure adequacy to take precedence. The air does not meet the air pollution standards for homes and young families The proposed Canvey Island development contradicts the principles of sustainable development under the NPPF, which mandates that safety, resilience, and flood risk must be primary considerations. Proceeding without a full flood assessment and infrastructure plan exposes residents, businesses, and emergency services to unacceptable risk.						relation to Canvey. Oil and Gas on the Island As set out in Plan paragraph 8.28 ‘Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development. Both installations have HSE consultation zones identified around them, in which it is expected that other development is controlled to		

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																		limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new development is proposed.' The current HSE consultation zones are indicated on the	

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																		policies map. The plan doesn't propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site. Policy SD8 'Development near Hazardous Uses' states that 'Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds'.	

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																		Flood Risk Assessment Level 1 and Level 2 Flood Risk Assessments are available to view on the Councils Website. Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions from major roads, notably the A13, A127 and A130.	

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																		The Council has not declared any Air Quality Management Areas (AQMAs). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal	

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																		(Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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0 7 2 5- 0 0 0 2	Individual	Jane t	Dun ford		Yes	B5	No	Not able to provide an emergency plan to evacuation plan as this area only has one means of entry and already over developed. The air quality does not meet the required standard and when asked to a councillor was told this does not matter. It does not met the the legal compliance as grey belt has notbeen used in the plan.	No	Consistent with national policy	Over development of an area that has only one means of entry and exit and no emergency flood plan with no planned improvements for access.	Include the north thundersley site in the draft plan and remove the sites C4, C9, C10F, C10G.	No	Not Ans wer ed	Not Ans were d	C	Air Quality Emergency Evacuation Plan Green/Grey Belt not considered Third Road needed onto Canvey	Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions from major roads, notably the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMA's). Generally, air pollution is low in Castle Point. Results from the monitoring points across	N

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																		the Borough suggest that air quality is improving. Emergency Evacuation Plan The Councils detailed emergency planning pages are here www.castlepoin t.gov.uk/emerge ncyplanning/ 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;	

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																		Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt	

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																		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. Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000	

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

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0 7 2 5- 0 0 0 3	Individual	Jane t	Dun ford		Yes	C10	No	The area would create a danger to road users and is very near to the sea wall, given risk to flooding. Over development of the area, lack of parking as the roads are all restricted parking.	No	Consistent with national policy	Investigate the North Thundersley site and added to the plan.		Not Ans wer ed	Not Ans wer ed	Not Ans were d	C	Third Road needed onto Canvey Transport	Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the	N

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																		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. Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex	

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																		County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.	
1 1 4 4- 0 0 0 1	Individual	Shei la	Durr anc e			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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	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.					Plan is 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 /	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											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						Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermine d 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	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. <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	

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																	geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1 1 4 4- 0 0 0 2	Individual	Shei la	Durr anc e			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1 1 4 4- 0 0 0 3	Individual	Shei la	Durr anc e			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1 1 4 2- 0 0 0 1	Individual	Alan	Dyer			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 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,	<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. <u>Consideration</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						and the 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	<u>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>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy	

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																		GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 4 2- 0 0 0 2	Individual	Alan	Dyer			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1 1 4 2- 0 0 0 3	Individual	Alan	Dyer			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1 1 9 8- 0 0 0 1	Individual	Mal col m	Dyer			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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.					Plan is 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 site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
											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						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	this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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 considered through the SFRA.	
1 1 9 8-	Individual	Mal col m	Dyer			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

I D R ef	Individual/ Organisati on/Agent?	Firs t Na me	Last Na me	If organ isatio n - name	Has agree d to public ation of Name/ Comm ents?	Poli cy/ Par a No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a. So und d?	3b. Positive/Effec tive/Justified/ Consistent?	3c. Explanation	4. Suggested modifications	5. Wis h to par tici pat e in exa m	6. Wh y?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0 0 0 2								Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1 1 9 8- 0 0 0 3	Individual	Mal col m	Dyer			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N