



Castle Point
BOROUGH COUNCIL

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0426-0001	Individual	L	McCoverley		Yes	B3	Yes	Not Stated	Yes		Not Stated		No			A	Policy B3 is legally sound and compliant	Support noted	N
0815-0001	Individual	Duncan	Macpherson		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0263-0001	Individual	David	Mahoney		Not Stated	Had4	Not Stated	Good morning I would like to object to building on Had4 in scrub lane.	Not Stated	Not Stated			Not Stated	Not Stated	No		Objects to building on Had4 in scrub lane.	Objection noted	N
0281-0001	Individual	DP	Mahoney		Not Stated	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing	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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								land supply.			predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Having						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. Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. Concerned	Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). Infrastructure Infrastructure matters (including health related) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Highways Impacts: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	Assessment (SFRA).

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											lived on the Island since 1969, I have always enjoyed Island life. Indeed I felt this was a wonderful, safe place for my Children to grow up, enjoying similar places that I did as a child. The Splash park has fallen into disrepair and we were unable to use it. The Seafront was very rundown and is now crammed on my occasions, so much so, that I haven't visited the Seafront or Sea walkways for over 10 years now, despite it being one road away. The Island is very unkempt at times, our bins being collected fortnightly (pink one week, black the next) our						about lack of ambulance station or A&E on Canvey and traffic gridlock. The shops are limited, the entertainment is limited, services and companies limited, schools, dentists and GP surgeries bursting and unable to cope. There should be no further building. Canvey Island is beyond full. Canvey Way needs to be a dual carriageway urgently for safety reasons (should there be a need to evacuate, that's 4 lanes to go off the Island). I have Children and Grandchildren who cannot		

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											Police Station is part time (no front desk, walk in available). A family member was involved in a car accident, it took too long for an ambulance and police to attend, which put that person's life in danger. Our Ambulance station in Sydervelt was closed a long time ago. We should always have an ambulance based at the Charfleets Ambulance Service Facility. We have no A&E, often having to travel to Orsett, Basildon or Southend, which is concerning and could be alleviated by having a Triage based at the Paddocks Medical						afford or indeed find properties available to be near me as I grow older. I myself had this issue 30 years ago, having to buy my first home off the Island, but return daily several times before and after work to care for my own Elderly Parents, before being able to return to the Island and buy a home able to cope with three generations, which I have owned for over 24 years. The Council homes system is also broken, many people from all over Kent, London and beyond are being permitted to take over the properties on		

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											Centre. Many people would not then require the travel over to the other places. Traffic is now reaching gridlock. It takes people ages to leave and return for and after a full working day. People now spill out from Benfleet station while waiting for Bus services, many buses standing room only. If you wish to visit Lakeside, or have a hospital appointment, it takes ages to even leave Canvey Way to join any major road, a funeral can cause major delays (and this isn't fair on the Mourners themselves either). I'm at a loss to understand why people wish to cram and cram too						the Island, with no connection to it. While people with Disabilities, DV situations and Bereaved who have local family networks that would help and support them, are forced away from the Island to Southend or Basildon and beyond. This is ridiculous too. You are crushing the very essence of this Island, the Sealife surrounding it and it often Floods internally because the roads and structures cannot cope with anything as it is, without adding many more homes and families to it. Already		

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											many people onto a cul-de-sac Island, removing the only area with large working facilities (Charfleets). Forcing many long running and several Generations owned business' out of work and facing closure. The shops are limited, the entertainment is limited, services and companies limited, schools, dentists and GP surgeries bursting and unable to cope. It's not unusual to find a 6/8 week wait to see anyone urgently for care and health worries. It's now a misery already to reside here, it's so cramped. Please use common sense and find other						changing the Thorney Bay camp into a home area, causes additional traffic and dangerous junctions, on a School route. The Island is filled to capacity, bursting at the seams and the quality of life and health is reducing monthly.		

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											areas around the District to place new homes. Please stop putting lives at risk, in the event of a Gas problem at the Oikos Centre, Floods or indeed just as worrying, from Planes that fly directly over the Island at a growing rate, due to the concerns over the dangerous ship in the Thames Estuary at Shoebury. There should be no further building. Canvey Island is beyond full. Canvey Way needs to be a dual carriageway urgently for safety reasons (should there be a need to evacuate, that's 4 lanes to go off the Island). I have Children and								

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											Grandchildren who cannot afford or indeed find properties available to be near me as I grow older. I myself had this issue 30 years ago, having to buy my first home off the Island, but return daily several times before and after work to care for my own Elderly Parents, before being able to return to the Island and buy a home able to cope with three generations, which I have owned for over 24 years. The Council homes system is also broken, many people from all over Kent, London and beyond are being permitted to take over the properties on the Island, with no								

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											connection to it. While people with Disabilities, DV situations and Bereaved who have local family networks that would help and support them, are forced away from the Island to Southend or Basildon and beyond. This is ridiculous too. You are crushing the very essence of this Island, the Sealife surrounding it and it often Floods internally because the roads and structures cannot cope with anything as it is, without adding many more homes and families to it. Already changing the Thorney Bay camp into a home area, causes additional traffic and dangerous								

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											junctions, on a School route. The Island is filled to capacity, bursting at the seams and the quality of life and health is reducing monthly.								
0281-0002	Individual	DP	Mahoney		Not Stated	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures .	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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1050-0001	Individual	Lina	Makneviciute		Yes	SP3	No	The Castle point plan does not provide the number of housing required by the Government. It only accounts for half of required housing and therefore will most definitely be found unsound by the government. It does not demonstrate that all options have been considered. This makes the plan vulnerable and gives developers a chance to submit Green belt applications.	No	Consistent with national policy	As mentioned above, this plan did not consider all viable options. North West Thundersley site could provide a large number of required housing and could make the numbers in the local plan I know that a road to NW Thundersley is possible and it is definitely the best site in terms of causing minimal impact on existing road and traffic conditions and other infrastructure such as medical centres and school as there would be an opportunity to build those there.	The plan needs to include the full number of houses required by government targets. The additional housing needs to go to the NW Thundersley site. If the plan is submitted in its current form it will definitely be deemed unsound. The plan needs to clearly prove that all grey belt options have been considered, and why any considered sites are not suitable. NW Thundersley site is most definitely suitable and it should be placed into the local plan.	Yes	Not Answered	Not Answered	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 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	N

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																		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 Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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0533-0001	Individual	Pamela	Maley		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0533-0002	Individual	Pamela	Maley		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					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	N

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											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.							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. 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.	

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0533-0003	Individual	Pamela	Maley		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
1334-0001	Individual	Pam	Maley			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.		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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1334-0002	Individual	Pam	Maley			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	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 should 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 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	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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											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.							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 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	

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																		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 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	

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																		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 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.	
1334-0003	Individual	Pam	Maley			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
1318-0001	Individual	Leonara	Mallake			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park		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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											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.								
1318-0002	Individual	Leonara	Mallake			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	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 should 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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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											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.							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 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	Assessment (SFRA).

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																		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 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	

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																		have been considered through the SFRA.	
1318-0003	Individual	Leonara	Mallake			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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0516-0001	Individual	Carol	Malone		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0516-0002	Individual	Carole	Malone		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					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	N

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											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.							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. 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.	

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0516-0003	Individual	Carol	Malone		Yes	Foreword					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 on this matter has been published and the					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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											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.								

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0541-0001	Individual	June	Malpass		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0541-0002	Individual	June	Malpass		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					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	N

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											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.							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. 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.	

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0541-0003	Individual	June	Malpass		Yes	Foreword					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 on this matter has been published and the					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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											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.								

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0617-0001	Individual	Rose	Malpass		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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0617-0002	Individual	Rose	Malpass		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					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	N

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											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.							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. 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.	

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0617-0003	Individual	Rose	Malpass		Yes	Foreword					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
1351-0001	Individual	J	Malpass			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.		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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1351-0002	Individual	J	Malpass			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	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 should 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 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	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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											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.							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 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	

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																		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 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	

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																		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 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.	
1351-0003	Individual	J	Malpass			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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0784-0001	Individual	Tracey	Mann		Yes	SP3	No	Failed to use Standard Methodology to calculate the number of homes required in Castle Point as directed by The Housing Minister in June. Failed to consider strategic alternatives like North West Thundersley. No credible 5 year Housing Plan.	No	Justified, Consistent with national policy	The Draft Local Plan is not consistent with National Policy and doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/Greybelt against new NPPF guidelines, Ignores NPPF guidelines that development should be directed away from areas at high risk of flooding particularly considering Canvey's low elevation, high groundwater levels, tidal influence and severe drainage issues. The Draft Local Plan is not justified. Site selection strategy is based and predetermined towards a 'no greenbelt build policy'.	Add North West Thundersley site, 187Ha which is a greenbelt/greybelt/brownfield site option for 7500 homes. It is a sustainable and accessible site and wouldn't undermine the wider function of the green belt. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. The island has unique constraints around infrastructure with only two roads available to get off the island and you have to go to one single roundabout (Waterside Farm) before you can access either road. Gridlock and permanent traffic queues are common now, the island has no capacity for more cars. Total housing (including NW Thundersley)= 11,000 homes	No	Not Answered	Not Answered	A	Not meeting standard method Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for	N	

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											Site selection is based on the 'over development of Brownfield sites', Not considered all sites by excluding North West Thundersley. Ignores NPPF guidelines that should be directed away from areas at high risk of flooding. SUDS measures are not appropriate for Canvey's unique geography and poor drainage structure. The 3316 houses urban homes for Canvey is not resident led. Canvey West homes puts residents at risk in the event of an emergency evacuation due to the flood risk and the danger posed by the proximity of							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 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	

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											the COMAH sites.							Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of	

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																		greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. 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. 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 Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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0992-0001	Agent	Timothy	Manna	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Hillside Enterprises have submitted an outline planning application for up to 160 dwellings at land at Solby Wood Farm, Daws Heath and are promoting the site through the Local Plan. It is considered that the Draft Local Plan does not meet the needs of the area in meeting its significant housing need due to its failure to release Green Belt land, thus failing the test of 'soundness' as listed within Paragraph 64 of the NPPF (2024). We would urge Castle Point to reconsider their approach to meeting development needs and		No	Not Answered	Yes	B - see additional supporting evidence	Hillside Enterprises have submitted an outline planning application for up to 160 dwellings at land at Solby Wood Farm, Daws Heath and are promoting the site through the Local Plan. It is considered that the Draft Local Plan does not meet the needs of the area in meeting its significant housing need due to its failure to release Green Belt land, thus failing the test of 'soundness' as listed within Paragraph 64 of the NPPF (2024). We would urge Castle Point to reconsider their approach to meeting development needs and the Green Belt to ensure that the needs for the Borough are met. This policy sets out that The Castle Point Local Plan will deliver a	Noted	N

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											the Green Belt to ensure that the needs for the Borough are met. This policy sets out that The Castle Point Local Plan will deliver a minimum of 6,196 new homes over the period 2026-2043. Paragraph 6.50 then goes on to say that this will be achieved by, 'at a minimum of 209 new homes per year for the years 2026-31 (years 1 to 5), increasing to 253 new homes per year for 2031-2036 (years 6-10) at least 554 homes per year from 2031-43 (years 11 to 17).' Notwithstanding this, the Draft Local Plan acknowledges that the current target						minimum of 6,196 new homes over the period 2026-2043. Paragraph 6.50 then goes on to say that this will be achieved by, 'at a minimum of 209 new homes per year for the years 2026-31 (years 1 to 5), increasing to 253 new homes per year for 2031-2036 (years 6-10) at least 554 homes per year from 2031-43 (years 11 to 17).' Notwithstanding this, the Draft Local Plan acknowledges that the current target for Castle Point as established using the standard methodology set out in the revised NPPF (2024) is 11,662 homes over the plan period, equating to 686 new dwellings per annum. Whilst it is acknowledged that Castle Point references		

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											for Castle Point as established using the standard methodology set out in the revised NPPF (2024) is 11,662 homes over the plan period, equating to 686 new dwellings per annum. Whilst it is acknowledged that Castle Point references the reasons as to why they cannot achieve the standard methodology number, this goes against the Government's objective of significantly boosting the supply of homes and indeed, Paragraph 62 of the NPPF (2024) which makes it clear that to determine the minimum number of homes						the reasons as to why they cannot achieve the standard methodology number, this goes against the Government's objective of significantly boosting the supply of homes and indeed, Paragraph 62 of the NPPF (2024) which makes it clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in National Planning Practice Guidance. The Brook Farm Appeal (ref: APP/M1520/W/24/3351658) found that the Council could not demonstrate a five year supply of deliverable housing sites, with a supply		

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											needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in National Planning Practice Guidance. The Brook Farm Appeal (ref: APP/M1520/W/24/3351658) found that the Council could not demonstrate a five year supply of deliverable housing sites, with a supply between 0.55 and 0.69 years, demonstrating that Castle Point's current projected housing figure falls significantly below the requirements. Further, the proposed development within Policy						between 0.55 and 0.69 years, demonstrating that Castle Point's current projected housing figure falls significantly below the requirements. Further, the proposed development within Policy SP3 states that almost half of all new homes within the plan period will be delivered within Canvey Island, which is considered to be an unsustainable approach to development and does not accord with Paragraph 61 of the NPPF (2024) which requires a 'variety of land' to deliver a sufficient supply of homes.		

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											SP3 states that almost half of all new homes within the plan period will be delivered within Canvey Island, which is considered to be an unsustainable approach to development and does not accord with Paragraph 61 of the NPPF (2024) which requires a 'variety of land' to deliver a sufficient supply of homes.								
09 92 - 00 02	Agent	Timothy	Manna	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	The council's Green Belt Assessment identified that land at Solby Wood Farm contributed strongly to the purposes of the Green Belt. However, we would urge Castle Point to reconsider the site as a sustainable Grey Belt residential allocation. At the		No	Not Answered	Yes	B - see additional supporting evidence	The council's Green Belt Assessment identified that land at Solby Wood Farm contributed strongly to the purposes of the Green Belt. However, we would urge Castle Point to reconsider the site as a sustainable Grey Belt residential allocation. At the national level, the	Noted	N

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											national level, the assessment and potential reclassification of Green Belt is directed by the NPPF and PPG, which provide the statutory framework for designation and introduce the concept of 'Grey Belt'. The key policy test is whether the release of land would undermine the five purposes of the Green Belt, with Purposes (c) and (e) generally excluded from localised appraisals. The recent Castle Point Green Belt Assessment (GBA, 2025) applies this framework to sub-area GB 11: South West of Daws Heath, within which the Site lies.						assessment and potential reclassification of Green Belt is directed by the NPPF and PPG, which provide the statutory framework for designation and introduce the concept of 'Grey Belt'. The key policy test is whether the release of land would undermine the five purposes of the Green Belt, with Purposes (c) and (e) generally excluded from localised appraisals. The recent Castle Point Green Belt Assessment (GBA, 2025) applies this framework to sub-area GB 11: South West of Daws Heath, within which the Site lies. The GBA assesses GB 11 as making a Strong contribution to Purpose (a) and a Moderate contribution to Purpose (b). However,		

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											The GBA assesses GB 11 as making a Strong contribution to Purpose (a) and a Moderate contribution to Purpose (b). However, further analysis shows these contributions are overstated. For example, the sub-area is already physically well-contained by Ancient Woodland and neighbouring settlements, meaning any development would follow a logical and defined edge rather than constituting unrestricted sprawl. Moreover, Daws Heath is consistently defined by the Council as a village rather than a town, limiting the applicability						further analysis shows these contributions are overstated. For example, the sub-area is already physically well-contained by Ancient Woodland and neighbouring settlements, meaning any development would follow a logical and defined edge rather than constituting unrestricted sprawl. Moreover, Daws Heath is consistently defined by the Council as a village rather than a town, limiting the applicability of Purpose (b). Lastly, Purpose (d) is excluded from the GBA and therefore offers no contribution to the assessment of GB 11. When aligned with the NPPF purposes however, the Site does not perform strongly against Purposes (a), (b)		

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											of Purpose (b). Lastly, Purpose (d) is excluded from the GBA and therefore offers no contribution to the assessment of GB 11. When aligned with the NPPF purposes however, the Site does not perform strongly against Purposes (a), (b) or (d), ultimately supporting its reclassification as potential Grey Belt land. Evidence from adjacent Parcels 4 and 8 shows that existing development has already weakened their contribution to the Green Belt purposes, reinforcing the limited impact that development of GB 11 would have. The GBA						or (d), ultimately supporting its reclassification as potential Grey Belt land. Evidence from adjacent Parcels 4 and 8 shows that existing development has already weakened their contribution to the Green Belt purposes, reinforcing the limited impact that development of GB 11 would have. The GBA ultimately concludes that releasing GB 11 would be unlikely to cause significant harm to the wider Green Belt due to its contained nature and separation from the main network. The Proposed Development would not therefore fundamentally compromise the wider Green Belt function. On this basis, GB 11 should be regarded as a		

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											ultimately concludes that releasing GB 11 would be unlikely to cause significant harm to the wider Green Belt due to its contained nature and separation from the main network. The Proposed Development would not therefore fundamentally compromise the wider Green Belt function. On this basis, GB 11 should be regarded as a potential Grey Belt candidate, consistent with national policy and guidance. Response to Green Belt Assessment relating to Land at Solby Wood Farm, Daws Heath The Site has been assessed under the updated PPG						potential Grey Belt candidate, consistent with national policy and guidance. Response to Green Belt Assessment relating to Land at Solby Wood Farm, Daws Heath The Site has been assessed under the updated PPG methodology and found to make only a Moderate to Weak Contribution to Green Belt Purpose (a) and a Weak or No Contribution to Purposes (b) and (d). As such, it does not fulfil a strong Green Belt function.		

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											methodology and found to make only a Moderate to Weak Contribution to Green Belt Purpose (a) and a Weak or No Contribution to Purposes (b) and (d). As such, it does not fulfil a strong Green Belt function.								
0992-0003	Agent	Timothy	Manna	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Justified	Paragraphs 6.54 and 6.55 indicate that the road network and health service provision within Castle Point are at capacity and that the Authority will not be able to accommodate any growth within these areas. We would question this approach taken by Castle Point, especially as the Transport Assessment (July 2025) has indicated that whilst some junctions		No	Not Answered	Yes	B - see additional supporting evidence	Concern that that Paragraphs 6.54 and 6.55 indicate that the road network and health service provision within Castle Point are at capacity and that the Authority will not be able to accommodate any growth within these areas when the Transport Assessment (July 2025) has indicated that whilst some junctions within the Authority are congested, it does not state that the whole road network is at capacity and outlines	The last sentence of the paragraph at 6.55 states that "This constraint is therefore a barrier to growth beyond that identified in this Plan". This explains why the transport assessment identifies mitigation for the amount of homes delivered in the plan and the health impact assessment considers the contributions to the health and well being of residents to be crucial to deliver the amount of homes within the plan.	N

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											within the Authority are congested, it does not state that the whole road network is at capacity and outlines methods for improvements within the various road networks of Castle Point. The Health Impact Assessment (July 2025) outlines that Policy SP4 Development Contributions facilitates contributions to strategic infrastructure and that improving health and wellbeing outcomes for residents and visitors is crucial. Taking the above into account, it is considered that paragraphs 6.54 and 6.55 contradict the evidence base.						methods for improvements within the various road networks of Castle Point. Also the Health Impact Assessment (July 2025) outlines that Policy SP4 Development Contributions facilitates contributions to strategic infrastructure and that improving health and wellbeing outcomes for residents and visitors is crucial.		

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0992-0004	Agent	Timothy	Manna	Hillside Enterprises c/o WSP	Yes	GB1	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Policy GB1 Development sets out that development within the Green Belt will not be supported in line with the NPPF (2024) and that the Council will look to positively preserve the Green Belt. Paragraph 17.12 sets out that development of Grey Belt land is permissible 'where development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, where there is a need for the development proposed, where the site is sustainably located with good access to services and transport choices, and		No	Not Answered	Yes	B - see additional supporting evidence	The Council has failed to properly assess and identify Green and Grey Belt sites within the draft Local Plan	All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Development decisions will be informed by consideration of the NPPF in its entirety. 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 network in and around Castle Point, Evidence of the impact of the Green	N

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											where high levels of affordable housing, infrastructure and open space provision are secured.' The Council has failed to properly assess and identify Green and Grey Belt sites within the draft Local Plan, and therefore the selection of potential housing allocation sites represents an unsound approach to site selection accordingly. In the withdrawn 2016 and 2019 plans, as well as within the Regulation 18 draft Local Plan, the Council recognised that significant Green Belt releases were required in order to meet its needs.							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 and considered wider areas.	

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											Paragraph 147 of the NPPF (2024) says that Local Authorities should be able to demonstrate the need for development within the review of the Green Belt boundaries and plans should give priority to previously developed land as well as Grey Belt. We would urge Castle Point to reflect on the above to accord with the NPPF (2024).								
09 92 - 00 05	Agent	Timothy	Manna	Hillside Enterprises c/o WSP	Yes	DH2	Yes		No	Justified, Consistent with national policy	Policy DH2 sets out that development will be approved where it does not result in the coalescence of settlements through a reduction in openness and space or the creation of urbanising		No	Not Answered	Yes	B-see additional supporting evidence	The emerging DH2 policy seeks to go beyond the requirements of Paragraph 143 of the NPPF (2024) by applying its objectives in a way that would prevent any further development in or around Daws	The council consider it necessary to provide additional protections to prevent urban sprawl and coalescence and maintain the openness of this area to ensure that the gaps between Daws Heath, and other settlements are maintained to protect its unique identity and semi rural character.	N

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											effects between settlements. The Castle Point Borough Green Belt Review (July 2025) refers to Daws Heath, as a village. Furthermore, the Brook Farm Appeal (ref: APP/M1520/W/24/3351658) found that Daws Heath represented a village. The emerging policy seeks to go beyond the requirements of Paragraph 143 of the NPPF (2024) by applying its objectives in a way that would prevent any further development in or around Daws Heath. This approach is particularly restrictive, as it relies on a subjective test of ‘reduction in openness or						Heath. This approach is particularly restrictive, as it relies on a subjective test of ‘reduction in openness or space’, effectively blocking development irrespective of any demonstrated local need.		

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											space', effectively blocking development irrespective of any demonstrated local need.								
0169-0001	Individual	Sharon	Mansfield		Not Stated	SP3	Not Stated	Please accept this email as my opposition to the plan as I have found it very difficult and frustrating filling in the online form. As a resident of Canvey I represent not only myself but 4 other family households who have equally struggled with the form. Our objections are that the total housing allocated cannot be delivered without proper infrastructure and	Not Stated	Not Stated	I accept new houses are needed but the volume Canvey island is expected to undertake with this plan will be detrimental to the island and residents. What would happen if there was a problem at the oil refinery or a flood with only one road for everyone to exit. I don't pretend I know anything about planning but as a resident I know building more than 3000 houses without better access for everyone is not viable. I understand there are more		Yes		No	A	Total housing allocated cannot be delivered without proper infrastructure and services. Canvey access: at present our only exit of Canvey is via waterside farm so in theory we only have one exit not 2. congestion for this area is already a big concern. Over the last 39 years more houses have been built with less amenities ie schools and doctors which has created problems for residents children have to go off the island for schools and with the traffic this is a nightmare. Canvey is unique in respect of it's below sea level	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SUDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options	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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								services at present our only exit of Canvey is via waterside farm so in theory we only have one exit not 2. congestion for this area is already a big concern. Over the last 39years more houses have been built with less amenities ie schools and doctors which has created problems for residents children have to go off the island for schools and with the traffic this is a nightmare. Canvey is unique in respect of it's below			sustainable options in hadleigh & Benfleet (blinking owl).						position with this comes extra problems with flooding and definitely bad drainage. I accept new houses are needed but the volume Canvey island is expected to undertake with this plan will be detrimental to the island and residents. Emergencies: What would happen if there was a problem at the oil refinery or a flood with only one road for everyone to exit. I understand there are more sustainable options in hadleigh & Benfleet (blinking owl).	have been considered through the SFRA. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	

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

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											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.						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.		
0141-0002	Individual	Sean	Marney		Yes	C4	No	Canvey West homes puts residents in the East	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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								at risk with emergency evacuation procedures.									evacuation procedures		
0652-0001	Individual	Lynne	Marriott		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0870-0001	Individual	Barbara	Marsden		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0871-0001	Individual	Raymond	Marsden		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0333-0001	Organisation	Andrew	Marsh	Historic England		Had1	Not Stated	We welcome the commitment to preparing a new Hadleigh Town Centre Master Plan, particularly criterion 7, which aims to create an appropriate setting for heritage assets, including the Grade I listed Church of St James	Not Stated			We welcome the numerous references to the historic environment within this chapter, particularly the reference to the Grade I listed Church of St James the Less and Hadleigh Castle. However, to ensure clarity and consistency, we recommend amending paragraph 10.2 to explicitly state that Hadleigh Castle is both a Scheduled Monument and a listed building, as is already done for the Church of St James the Less.					We welcome the numerous references to the historic environment within this chapter, particularly the reference to the Grade I listed Church of St James the Less and Hadleigh Castle. However, to ensure clarity and consistency, we recommend amending paragraph 10.2 to explicitly state that Hadleigh Castle	Modification as follows (bold text additions, strike through deletions). 10.2 Hadleigh Castle (a Scheduled Monument and Grade 1 listed) sits to the south of the town centre and dates to Saxon times. Whilst it is in a ruined state, it is the centrepiece of the Hadleigh Castle Country Park, a major tourist attraction within the Borough which was home to the 2012 Olympic Mountain Biking events.	Y - 10.2 Hadleigh Castle (a Scheduled Monument and Grade 1 listed) sits to the south of the town centre and dates to Saxon times.

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								the Less. As set out in our Good Practice Advice Note 3 (The Setting of Heritage Assets), the setting of a heritage asset can contribute to its significance, as well as to the ability to appreciate that significance. We therefore welcome the focus on public realm improvements that will help sustain and enhance the significance of heritage assets within the town Historic England, Brooklands , 24 Brooklands					This clarification will help readers fully appreciate the significance of both heritage assets.				is both a Scheduled Monument and a listed building, as is already done for the Church of St James the Less. This clarification will help readers fully appreciate the significance of both heritage assets' We welcome the commitment to preparing a new Hadleigh Town Centre Master Plan, particularly criterion 7, which aims to create an appropriate setting for heritage assets, including the Grade I listed Church of St James the Less. As set out in our Good Practice Advice Note 3 (The Setting of Heritage Assets), the setting of a heritage asset can contribute to its		

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								Avenue, Cambridge CB2 8BU Telephone 01223 582749 historicengland.org.uk Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk//privacy centre by focusing on those aspects of their setting which make a										significance, as well as to the ability to appreciate that significance. We therefore welcome the focus on public realm improvements that will help sustain and enhance the significance of heritage assets within the town centre by focusing on those aspects of their setting which make a positive contribution to their significance.		

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								positive contribution to their significance.											
0333-0002	Organisation	Andrew	Marsh	Historic England		Had2	Not Stated	We welcome the supporting text at paragraph 10.20, which acknowledges the site's visual prominence and its role in forming the setting of Hadleigh Castle.	Not Stated			However, to ensure this consideration carries appropriate weight in decision making, we recommend that it be incorporated into Policy Had2 as a new criterion. This would give the issue greater prominence and strengthen the protection of the castle's setting and, in turn, its overall significance.					We welcome the supporting text at paragraph 10.20, which acknowledges the site's visual prominence and its role in forming the setting of Hadleigh Castle. However, to ensure this consideration carries appropriate weight in decision making, we recommend that it be incorporated into Policy Had2 as a new criterion. This would give the issue greater prominence and strengthen the protection of the castle's setting and, in turn, its	Y - References to Hadleigh Castle and its setting and environmental assets added to paragraphs a and b (as set out in the Schedule of Mods and Statement of Common Ground)	Y - References to Hadleigh Castle and its setting and environmental assets added to paragraphs a and b (as set out in the Schedule of Mods and Statement of Common Ground)

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																	overall significance.		
0333-0003	Organisation	Andrew	Marsh	Historic England		DH1	Yes	We welcome criterion 1, which acknowledges the historic pattern of irregular small fields and ancient woodland. These features make a valuable contribution to the area's historic environment and sense of place. We therefore particularly support the requirement for this landscape character to be protected and enhanced.	Yes								We welcome criterion 1, which acknowledges the historic pattern of irregular small fields and ancient woodland. These features make a valuable contribution to the area's historic environment and sense of place. We therefore particularly support the requirement for this landscape character to be protected and enhanced.	Support noted	N
0333-0004	Organisation	Andrew	Marsh	Historic England		D9	Yes	We welcome the comprehensive approach taken in Policy D9	Yes			While we consider the policy to be sound, we recommend that the wording is reviewed to replace terms such as "should"					We welcome the comprehensive approach taken in Policy D9 to the conservation and	Mods to Policy D9 agreed as set out in the Schedule of Common Ground. Hyperlinks added and replacements of	Yes - Mods to Policy D9 agreed as set out in the Schedule of Mods and Statement of Common

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								to the conservation and enhancement of the historic environment. The policy provides a clear framework for the consideration of both designated and non-designated heritage assets, and we are pleased to see reference to key supporting documents and management plans.				with “shall” or “must” where appropriate. This would help to reinforce the requirements and expectations for applicants and decision makers. For ease of access, we also suggest that hyperlinks to the relevant documents (such as the South Benfleet Conservation Area Management Plan, Florence Gardens Conservation Area Management Plan, and the South Benfleet Conservation Area Design Code) are included in the online version of the Plan. Finally, we recommend including a caveat to clarify that the lists of heritage assets appended to the Plan (Appendix H) are subject to change over time, for example as new non-designated heritage assets are identified or as designations are updated. This will ensure that the Plan remains flexible and up to					enhancement of the historic environment. The policy provides a clear framework for the consideration of both designated and non-designated heritage assets, and we are pleased to see reference to key supporting documents and management plans. While we consider the policy to be sound, we recommend that the wording is reviewed to replace terms such as “should” with “shall” or “must” where appropriate. This would help to reinforce the requirements and expectations for applicants and decision makers. For ease of access, we also suggest that hyperlinks to the relevant	'should' with 'Shall/Must'.	Ground. Hyperlinks added and replacements of 'should' with 'Shall/Must'.

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												date as further information becomes available.					documents (such as the South Benfleet Conservation Area Management Plan, Florence Gardens Conservation Area Management Plan, and the South Benfleet Conservation Area Design Code) are included in the online version of the Plan.		
1086-0001	Individual	Joshua	Marsh		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	I am writing to formally object to Policy Had4 as set out on page 73, paragraphs 10.27–10.31. The proposal for 114 homes is excessive and unsuitable for this location. The plan relies on a 100 dwellings per hectare (dph) urban density guide, whereas the surrounding area currently averages closer to 20dph. This would mean		No	Not Answered	Not Answered		Objects to HAD4 because: Traffic Infrastructure Density Protect the trees on site 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		N

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											blocks of flats up to four storeys high, completely out of keeping with the existing character of Scrub Lane. The claim that the design would reflect the surrounding area is misleading, as the opposite side of Scrub Lane has far lower density housing, around 15dph, and the proposed development would not blend with the existing street scene. Introducing 114 homes and over 200 cars would put huge pressure on the already busy Scrub Lane/Rectory Road junction and increase strain on local services, particularly												covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Safeguarding the trees will be done so at planning application stage	

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											doctors' surgeries. Additionally, pressure on local schooling and other infrastructure . Therefore, to avoid putting further pressure on the local residents, ensuring that double yellow lines are put on all local roads to avoid the 200 cars parking locally, more doctors, more schools, more dentists, more local amenities, improved facilities (pipes /sewage). Residents have consistently supported the protection of Green Belt land and the use of brownfield sites for new housing. Nowhere did residents									

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											agree to destroy areas like Scrub Lane through inappropriate overdevelopment. I understand land will be built on but this is unsustainable and therefore should be more fitting to suit the current infrastructure - for example 4 luxury homes. It is also worth noting that there are some very old trees at least 20, all oak except one, an ash, not larch which should be preserved.								

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1087-0001	Individual	Lauren	Marsh		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	am writing to formally object to Policy Had4 as set out on page 73, paragraphs 10.27–10.31. The proposal for 114 homes is excessive and unsuitable for this location. The plan relies on a 100 dwellings per hectare (dph) urban density guide, whereas the surrounding area currently averages closer to 20dph. This would mean blocks of flats up to four storeys high, completely out of keeping with the existing character of Scrub Lane. The claim that the design would reflect the surrounding area is misleading, as the opposite side		No	Not Answered	Not Answered		Objects to HAD4 because: Traffic Infrastructure Density Protect the trees on site 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). Safeguarding the trees will be done so at planning application stage	N	

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											of Scrub Lane has far lower density housing, around 15dph, and the proposed development would not blend with the existing street scene. Introducing 114 homes and over 200 cars would put huge pressure on the already busy Scrub Lane/Rectory Road junction and increase strain on local services, particularly doctors' surgeries. Additionally, pressure on local schooling and other infrastructure . Therefore to avoid putting further pressure on the local residents, ensuring that double yellow lines are put on all local roads to avoid									

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											the 200 cars parking locally, more doctors, more schools, more dentists, more local amenities, improved facilities (pipes / sewage). Residents have consistently supported the protection of Green Belt land and the use of brownfield sites for new housing. Nowhere did residents agree to destroy areas like Scrub Lane through inappropriate overdevelopment. I understand land will be built on but this is unsustainable and therefore should be more fitting to suit the current infrastructure - for example										

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											4 luxury homes. It is also worth noting that there are some very old trees at least 20, all oak except one, an ash, not larch which should be preserved.								

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0026-0001	Individual	Reece	Marshall		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk,	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	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	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for	N

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								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			Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to	investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.					• Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	rolling 5 year housing land supply.	

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								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			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								

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								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			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								

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								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				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							

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								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			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								

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								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			mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high								

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								reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the			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								

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								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			be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far								

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								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			more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised								

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								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,			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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								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			cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3								

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								public interest.			filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are								

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											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								

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											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								

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											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								

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											of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style								

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											specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently								

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											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.								

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											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									

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											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								

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											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								

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											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								

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											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								

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											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								

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											sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0026-0002	Individual	Reece	Marshall		Yes	Forward	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								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											

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								found unsound on procedural grounds alone.											
0247-0001	Individual	Christine	Marshall		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft is not legally compliant, as it has failed to consider strategic alternatives, for instance, North West Thundersley as it has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/Grey Belt against new NPPF guidelines. The draft local plan isn't justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is solely based on the 'over development of Brownfield sites'. The plan has not	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											considered all sites, with no Greenbelt/Gray 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.						for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0247-0002	Individual	Christine	Marshall		Yes	C4	No	The proposed number of Canvey West homes puts residents to the East at risk with emergency	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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								evacuation procedures.											
0829-0001	Individual	Reece	Marshall		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt / Grey Belt sites added, with the exclusion	Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/ Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Answered	Not Answered		Not meeting standard method Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point 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	N

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											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.							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 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. 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. 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	

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																		Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood 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.	

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																		uk/emergencyplanning/	

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1302-0001	Individual	June	Marsterson			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	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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 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						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	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 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1302-0002	Individual	June	Marsterson			Hou5		The plan has included Thorney Bay development for 173 homes, so									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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								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.											
1302-0003	Individual	June	Marsterson			C4					The number of Canvey West homes puts residents in the East at risk with emergency						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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											evacuation procedures.						living at East Canvey		
1303-0001	Individual	Brian	Marsterson			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	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 predetermined towards a "no Greenbelt build 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	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led						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	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 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.	
1303-0002	Individual	Brian	Marsterson			Hou5		The plan has included Thorney Bay developme									Policy HOU5 should make provision for improved site environment for	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								nt 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.									the local residents		
1303-0003	Individual	Brian	Marsterson			C4					The number of Canvey West homes puts residents in the East at						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. 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
											risk with emergency evacuation procedures.						those residents living at East Canvey		
0726-0001	Organisation	Nicholas	Martin	ACHES	Yes	Whole Plan	Yes		Yes				Yes	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0676-0001	Individual	Benji	Massarin		Yes	SP3	No	The Castle Point Plan Draft does not appear to be legally compliant for several key reasons: • Lack of meaningful community engagement: The plan was not prepared in a manner that aligns with the Council's own Statement of Community Involvement. Residents have not been properly consulted on critical	No	Positively prepared, Effective, Justified, Consistent with national policy	I do not consider the Castle Point Plan Draft to be sound for the following reasons: Not Positively Prepared: The plan proposes significant housing growth across Castle Point—particularly on Canvey Island—without delivering the critical infrastructure required to support it. The absence of a third access road to Canvey undermines the plan's ability to meet the area's needs sustainably or safely. Infrastructure	To make the Castle Point Plan Draft legally compliant and sound, the following modifications should be made: 1. Infrastructure Delivery and Access (Policy IN1, SP1): • Reintroduce and prioritise the creation of a third access road to Canvey Island as a strategic infrastructure objective within the plan period. • Reinstate the Canvey West Access Taskforce to ensure proper delivery oversight and consultation with Essex County Council and the Environment Agency. • Explicitly state that no further major residential development on Canvey Island should be approved until this	No	Not Answered	Not Answered	A	lack of DTC Lack of Engagement Flood risk Alignment with the LDS Failure to demonstrate deliverability Third road onto canvey needed Lack of consideration for alternative sites Loss of community facilities not supported	DTC 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. Engagement Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Flood Risk The Strategic Flood Risk Assessment provides an overview of flood risk within Castle Point and then provides site specific information for the allocations in the Castle Point Plan and provides recommendations on how to address any	N

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								aspects such as infrastructure capacity, site deliverability, and the impact on local services. Proposals to redevelop essential community assets (e.g. health centres, police station, fire station, libraries) were not clearly communicated to the public, which contradicts the requirements for transparent consultation. • Duty to Cooperate not demonstrably fulfilled: The Plan fails to			and transport capacity are already under significant strain and no realistic solutions have been included in the draft. The plan also fails to demonstrate how it has accommodated unmet need from neighbouring areas through agreement or collaboration. Not Justified: The strategy appears to prioritise housing numbers over deliverability, safety, and sustainability. Brownfield sites proposed for redevelopment include vital community infrastructure such as health centres, fire and police stations, and libraries. The plan lacks a clear	access is secured and funded. 2. Site Allocations and Community Facilities (Policies HO1, SP1): • Remove or revise proposals to redevelop key community infrastructure sites (e.g. fire station, health centres, libraries, police station, town centre car parks) listed as “brownfield” without a clearly identified replacement strategy. • Ensure the retention and modernisation of essential community infrastructure is included in the plan as a priority, particularly in underserved or isolated areas such as Canvey Island. 3. Flood Risk and Climate Resilience (Policy CC1): • Require a full site-specific flood risk and drainage assessment for all proposed development sites on Canvey Island						flood risk arising through development. Alignment with the LDS To ensure that the plan is supported by a robust evidence base we have had to adjust the timeline to undertake additional work. When these decisions have been made we have updated the LDS to reflect this for transparency. The Council has ensured that the plan has been positively prepared with all necessary work being undertaken to ensure it is robust. Deliverability All the sites allocated within the plan have been promoted through the call for sites process which has indicated that the site is available for development by the landowner. All other sites are Council owned sites which CPBC has deemed available for development. Third road onto Canvey The plan has been subject to detailed Transport Assessment,	

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								show sufficient evidence that Castle Point Borough Council has worked collaboratively with Essex County Council, the Environment Agency, and neighbouring local authorities — especially regarding shared infrastructure, flood risk mitigation, and strategic transport such as a third road access to Canvey Island. Inadequate consideration of flood risk and environmental constraints : Although			explanation as to why these sites were chosen over more sustainable or deliverable alternatives. Moreover, there is no clear evidence that alternative strategies—such as lower-density development or infrastructure-first approaches—were adequately considered or consulted on. Not Effective: Many sites included in the draft are not demonstrably deliverable. Rebecca Harris MP and local stakeholders have pointed out that there is no clear evidence of landowner commitment, infrastructure funding, or timelines to bring sites	and other flood-prone areas before planning permission can be granted. - Add a policy condition that flood risk must be demonstrably reduced (not just managed) through mitigation measures, including investment in drainage, sea defences, and sustainable urban drainage systems (SuDS). - Strengthen wording to ensure compliance with the Section 19 Flood Report recommendations. 4. Housing Delivery (Policy HO1, Appendix A): - Reduce the plan period from 20 years to 15 years to avoid unnecessary overestimation of housing need and reduce strain on infrastructure. - Remove sites from the housing trajectory that lack evidence of landowner commitment or deliverability within the plan						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 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. Alternative sites not considered	

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								the plan is accompanied by a Sustainability Appraisal, it does not adequately address the environmental consequences of building on Canvey Island, a known flood-prone area. There is insufficient evidence that the Council has complied with the Habitats Regulations or fully assessed flood mitigation and drainage infrastructure in line with legal obligations. Unclear alignment with the Local Developm			forward. This undermines the plan's effectiveness over the plan period. Strategic transport priorities—especially a third access road to Canvey—have been ignored or deferred, despite being critical to enabling growth. Not Consistent with National Policy: The plan does not enable genuinely sustainable development as set out in the National Planning Policy Framework (NPPF). Proposals to build in high flood-risk areas—particularly on Canvey Island—without adequate mitigation or investment in	period. - Include a phased approach to housing delivery tied to infrastructure improvements, ensuring development is not front-loaded before roads, schools, and healthcare capacity are increased. 5. Cross-Boundary Cooperation and Evidence Base (Policy IM1): - Provide an updated and transparent Statement of Common Ground showing joint working with Essex County Council, NHS bodies, utility providers, and neighbouring authorities. - Include clear timelines, funding plans, and outcome targets for all critical infrastructure (transport, education, health) referenced in the Infrastructure Delivery Plan. 6. Revised Wording (Suggested):						All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Loss of Community Facilities Policy INFRA1 supports community facilities and safeguards against redevelopment of these without sufficient alternatives provided.	

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								ent Scheme: The Council’s own timetable and approach outlined in the Local Development Scheme have shifted repeatedly , raising concerns about whether the statutory process and timeline have been properly followed. • Failure to demonstrate deliverability: Sites have been included in the draft without evidence of deliverability or landowner commitment. This may mislead residents			drainage infrastructure directly contradict NPPF principles. In addition, the proposed loss of valued community facilities (libraries, healthcare centres, public services) runs counter to national policy on community cohesion, resilience, and accessibility. For these reasons, I believe the Castle Point Plan fails all four tests of soundness and should be revised significantly before proceeding to submission.	Current Policy SP1 – Spatial Strategy (revision proposed): “Development on Canvey Island will only be supported where it is demonstrated that adequate emergency access, flood risk mitigation, and supporting infrastructure are in place and deliverable within the plan period. Strategic development shall not proceed in areas with a single access route unless a secondary access is secured.”							

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								and does not meet legal requirements to present a plan that can be realistically implemented within the identified timeframe. For these reasons, I do not consider the Castle Point Plan Draft to be legally compliant under the Planning and Compulsory Purchase Act 2004 or the Town and Country Planning (Local Planning) (England) Regulations 2012.											
0216-0001	Individual	Kathryn	Masters		Yes	Whole Plan	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultati	Yes		I consider the draft plan to be sound		Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

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								on I consider the the draft lan to be legally compliant											
0275-0001	Organisation	Joe	May	Leigh Town Council	Not Stated	SP3	Not Stated	The following comments regarding the Castle Point Plan have been agreed by Leigh-on-Sea Town Council's Planning, Licensing and Environment Committee on Tuesday 9th September 2025: We write further to our letter of 18 September 2024 and your subsequent response. Previously Leigh-on-Sea Town Council expressed strong objection to the Salvation Army land in Hadleigh	Not Stated				Not Stated		No	B - see 0275 - 0003	Salvation Army land in Hadleigh Leigh-on-Sea Town Council is concerned that the Salvation Army land in Hadleigh is vulnerable to being developed, whilst acknowledging that it has not been allocated for development. Castle Point Borough Council has not met the targets for housing set by Government, the vulnerability is clear despite Green Belt policy. If such an application comes forward Leigh-on-Sea Town Council will seek to object in the strongest possible terms for all the previously rehearsed reasons and we would be	Comments noted.	N

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								being allocated for development. Whilst we acknowledge the fact that the latest iteration of the Local Plan does not allocate this land for development we remain concerned at its now evident vulnerability and there is no preclusion to the landowner/developer making a planning application in advance of the adoption of the Local Plan. Should they do so, given that non-inclusion will not have been endorsed by an									grateful if, therefore, you would keep our correspondence on file to be laid before your members. <u>Bus Enhancements</u> The Town Council is pleased to see the enhancement of the bus services between Hadleigh and Leigh-on-Sea which we very much hope will lead to less congestion and traffic movements.		

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								Inspector and that Castle Point Borough Council has not met the targets for housing set by Government, the vulnerability is clear despite Green Belt policy. If such an application comes forward Leigh-on-Sea Town Council will seek to object in the strongest possible terms for all the previously rehearsed reasons and we would be grateful if, therefore, you would keep our correspondence on file to be laid before your members. Alternative											

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								y, given the Salvation Army's previous position we anticipate that they or a developer will seek to promote the land through the Local Plan EIP process, possibly running alongside any planning application. Our objections would be equally relevant to such a scenario and we would ask again that you keep them on record for the Inspector to take them into account. We would be grateful if you would take these comments into											

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								account before deciding whether to confirm that allocation. The Town Council is pleased to see the enhancement of the bus services between Hadleigh and Leigh-on-Sea which we very much hope will lead to less congestion and traffic movements.											
0275-0002	Organisation	Joe	May	Leigh Town Council	Not Stated	Had4	Not Stated	We have also considered the allocation HAD4 for 114 homes. Leigh-on-Sea Town Council consider that such a development could have a serious knock on effect to Leigh-on-	Not Stated				Not Stated		No	B - see 0275 - 0003	<u>Policy HAD4</u> We have also considered the allocation HAD4 for 114 homes. Leigh-on-Sea Town Council consider that such a development could have a serious knock on effect to Leigh-on-Sea particularly the Highlands Boulevard area through the town to the Station where	Comments noted.	N

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								Sea particularly the Highlands Boulevard area through the town to the Station where the temptation for commuters from the development to use Leigh station will create a detrimental effect on the road system and parking in the area which is already under stress.									the temptation for commuters from the development to use Leigh station will create a detrimental effect on the road system and parking in the area which is already under stress.		
0275-0003	Organisation	Joe	May	Leigh Town Council	Not Stated	Whole Plan	Not Stated	The following comments regarding the Castle Point Plan have been agreed by Leigh-on-Sea Town Council's Planning, Licensing and Environment Committee on Tuesday									The following comments regarding the Castle Point Plan have been agreed by Leigh-on-Sea Town Council's Planning, Licensing and Environment Committee on Tuesday 9th September 2025 and re-agreed on Tuesday 11th	Noted.	N

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								9th September 2025 and re-agreed on Tuesday 11th November 2025.									November 2025.		
0563-0001	Individual	Richard	May		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,	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 increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to	N

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											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 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								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 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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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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 contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0563-0002	Individual	Richard	May		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development	Thorney 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	N

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											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.						which improves the site environment for local residents	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. 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.	

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0563-0003	Individual	Richard	May		Yes	Fore word					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 on this matter has been published and the					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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											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.								

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0384-0001	Individual	Pamela	McCarthy		Yes	SP3		BY HAND TO; CASTLE POINT BOROUGH COUNCIL I am attaching this letter to the Booklet provided to make comments to Castle Point Plan Regulation 19 Draft document. I request that you note my comments and objections in connection with the above mentioned draft plan. Can i say at the outset this plan cost the Council (us Council tax payers) a vast sum of money and the Response booklet is not at all user friendly for completion									o Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. o The proposed allocation of the vast number of homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. o The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. o 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	<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 – 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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								. Hence this letter. The Local Plan gives opportunity to develop the area of Castle Point. However, being a resident on Canvey Island since the early sixties I have a vested interest in the Island part of Castle Point and am horrified and concerned that the continuous flood risk does not appear to deter the planning for over 6000 new dwellings. The safety of island residents is of great risk not only of flooding but of any									decrease in proposed housing numbers on Canvey Island. o The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience.	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>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	

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								major catastrophe/ accident happening within or on the Island where evacuation might be required. The Plan has not as far as I can tell taken to account any evacuation process. The houses proposed would add at least another 12000 (minimum) residents and it is no secret that current access on and off Canvey Island is extremely limited so I object and comment that how is the safety of even more inhabitants on the Island going to be safe in any											

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								flood or catastrophic incident. The Plan should be 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 but 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 letter treated as my main response,											

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								as it is far easier for me to outline the strength of my views and include greater detail in this way. On the subject of disaster or heavy downpours canvey way is the only safe entry and exit to canvey island should such an event occur we could use essex way to rayleigh or southend but the elephant in the room is with such torrential downpours most manholes are lifted by the pressure of floodwater; therefore making use of such a route will											

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								very difficult indeed, and of course the constant flooding of the underpass thus closing off any use for escape, which leaves only one route for evacuation canvey way. This safety aspect really needs to be addressed. With regard to Green Belt. Green Belt is not just a planning designation , many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible.											

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								However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. Homes are important but so also is our green belt. The key points I wish to raise in this response regarding the draft plan are: o Castle Point faces serious challenges , including surface water flooding, infrastructure strain and pressure to accommodate growth. o The proposed allocation of the vast number of homes to Canvey Island is											

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								excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. o The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. o 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											

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								numbers on Canvey Island. 0 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											

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								(NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. I believe the Plan risks being found unsound on procedural grounds alone. The Sustainability Appraisal, which underpins											

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								the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Where is this evidence based???? The above 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											

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								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 meet these tests. There is absolutely no doubt that the housing target for Castle Point											

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								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 has											

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								considered every viable alternative. No reference to alternatives at all in the marketing material. Please note my objection and I would be happy to talk to anyone to discuss my concerns further. I have attended a few of the various meetings held but find it difficult to discuss and receive answers in regard to evidence based queries I raise.											
1004-0001	Individual	Kathryn	McCarthy		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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1270-0001	Individual	Thomas	McCleaghan			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	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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 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						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	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 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1270-0002	Individual	Thomas	McClenaghan			Hou5		The plan has included Thorney Bay development for 173 homes, so									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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								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.											
1270-0003	Individual	Thomas	McClenaghan			C4					The number of Canvey West homes puts residents in the East at risk with emergency						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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											evacuation procedures.						living at East Canvey		
1298-0001	Individual	Joan	McCulloch			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	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 predetermined towards a "no Greenbelt build 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	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led						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	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 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.	
1298-0002	Individual	Joan	McCulloch			Hou5		The plan has included Thorney Bay developme									Policy HOU5 should make provision for improved site environment for	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								nt 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.									the local residents		
1298-0003	Individual	Joan	McCulloch			C4					The number of Canvey West homes puts residents in the East at						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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											risk with emergency evacuation procedures.						those residents living at East Canvey		
0876-0001	Individual	Andrew	McDonald		Yes	HAD4	Yes		No	Effective, Justified	The plan does not meet the needs of the local residents, and is purely an academic exercise in how many properties can be placed on an individual site. The proposal for 114 new homes in Scrub Lane takes no account for the impact on local schools or local medical facilities. Such level of development will mean an additional 230 to 250 people in this area. Additionally no impact on the serious road congestion 200 plus vehicles will have. At peak times the road is almost grid	More consultation with local residents needs. Perhaps a questionnaire to everyone living in the borough.	No	Not Answered	Not Answered		Objecting to HAD4 because: Traffic Parking Infrastructure Density Emergency Services impact Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.	N

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											locked any additional vehicles will only deteriorate the situation. Has an emergency services impact statement been arranged between 8.30 and 9.00 on weekdays?							Emergency Services Impact Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
0877-0001	Individual	Patricia	McDonald		Yes	HAD4	Yes		No	Effective, Justified	Concerns regarding increased road traffic. Additional concerns regarding impact on local schools and medical facilities. Plus serious loss of green spaces.	More focused needs on the requirements of residents.	No	Not Answered	Not Answered	A	Objecting to HAD4 because: Traffic Infrastructure Loss of Green Space Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Loss of Green Space This is a private piece of land with no public access or rights of way across it.	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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0552-0001	Individual	Janice	McDonnell		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0552-0002	Individual	Janice	McDonnell		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					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	N

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											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.							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. 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.	

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0552-0003	Individual	Janice	McDonnell		Yes	Foreword					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
1153-0001	Individual	Joan	McGilligan			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	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	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 Castle Point's approach to the site review is outlined	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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 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	

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											3316 urban homes for Canvey is not resident led							SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1153-0002	Individual	Joan	McGilligan			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1153-0003	Individual	Joan	McGilligan			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
0109-0001	Individual	Tim	McGinley		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing	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,	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	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	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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								land supply.			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	Charfleets Industrial Estate site from the plan. Total housing target of 11,000					target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number	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.	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											Island's unique geography and drainage infrastructure, the 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,						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.		

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											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								

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											for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.								
0109-0002	Individual	Tim	McGinley		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0098-0001	Individual	Lee	McGonagle		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores	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

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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						Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with	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.	Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											Canvey is not resident led.						emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
0098-0002	Individual	Lee	McGonagle		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0195-0001	Individual	Dulcie	McGovern		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West	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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for

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								Thundersley. It has no credible five-year housing land supply.			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						have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											. The 3,316+ urban homes for Canvey is not resident led.								
0195-0002	Individual	Dulcie	McGovern		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0059-0001	Individual	Steve	McGregor		Not Stated	C5	Not Stated	A restricted tunnel for cars, pedestrians and cyclists would not only provide a needed 3rd access but also open up employment opportunities in Thurrock to Canvey residents. This could also contribute to the soundness of policy C4. The Thames enterprise park would	Not Stated				Not Stated		Yes additional information regarding access plans off Canvey	A	Policy C5 A restricted tunnel for cars, pedestrians and cyclists would not only provide a needed 3rd access but also open up employment opportunities in Thurrock to Canvey residents. This could also contribute to the soundness of policy C4. The Thames enterprise park would be 2.3 miles, 10-15 minutes bike ride away. A smaller tunnel would be quicker and cheaper to construct with precast sections	Comments noted. Submission papers saved to internal folder 'Canvey Access Feasibility Study (Forthcoming)' for further consideration as part of the future project.	N

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								be 2.3 miles, 10-15 minutes bike ride away. A smaller tunnel would be quicker and cheaper to construct with precast sections as an example that will minimise length of time work is undertaken in the SSSI. Once completed the marsh can be reinstated with no need for mitigation. Kind regards Steve									as an example that will minimise length of time work is undertaken in the SSSI. Once completed the marsh can be reinstated with no need for mitigation.		
0656-0001	Individual	Steven	McGregor		Yes	C5	Yes		No	Justified	The plan could include more information to justify the need of a new route of access, understood it is covered in the Infrastructure development	The IDP mentions the Thurrock port but the Thames enterprise park being developed surely improves future business and job opportunities even more . A new bus route created to this area could also further justify	No	Not Answered	Yes - See attachments		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	N

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											plan. Could include more details of possible options for the crossing even if just an idea to be developed in the feasibility study.	the need for the new access. A 16 mile car journey reduced to 4 mile journey from the same place on Canvey to shell haven Terminal for example. Tunnelling should be considered in the feasibility study to reduce impact on the habitat sites. The mention of raised engineering in the IDP suggests this not considered or deemed too expensive. A method such as cut -and- cover and/ or immersed tube to reduce cost might have a short term impact but as seen with the Conwy tunnel on the A55 it can benefit wildlife once constructed.						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 transport improvement projects identified in the Local Transport Plan.	
0656-0002	Individual	Steven	McGregor		Yes	B8	Yes		Yes				No	Not Answered	Yes - See attachments		Policy B8 is sound and legally compliant	Support noted.	N
0656-0003	Individual	Steven	McGregor		Yes	Thun2	Yes		Yes				No	Not Answered	Yes - See attachments		Policy Thun2 is sound and legally compliant	Support noted.	N
0656	Individual	Steven	McGregor		Yes	C7	Yes		Yes				No	Not Answered	Yes - See		Policy C7 is sound and	Support noted.	N

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- 00 04														were d	attach ments		legally compliant		
00 13 - 00 01	Individual	Kelly	McKenzie		Yes	SP3	No	Good afternoon, I'm disappointed that the consultation process is far too complicated for me to effectively express my views and I can't imagine I'm the only one finding it challenging! Therefore I have set out my response to your plan below: The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their	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	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	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and inadequate infrastructure. • Supports inclusion of North West Thundersley (Blinking Owl site) as a more sustainable and accessible strategic growth location. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, particularly regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms.	N

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								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			imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant	deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.					modifications to reduce pressure on Canvey and include North West Thundersley.	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								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			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								

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								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 colloquiall			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								

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								y 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			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								

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								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			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								

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								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			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								

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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			intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local								

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								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			constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify.								

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								and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council			North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph								

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								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			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								

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

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								in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that								

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											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								

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											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								

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											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,								

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											which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it								

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											could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable								

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											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								

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											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									

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											West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglens Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex.								

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											Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also								

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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								

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											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,								

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											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								

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											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								

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											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								

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											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.								
0013-0002	Individual	Kelly	McKenzie		Yes	Forward	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								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											

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								found unsound on procedural grounds alone.											
0015-0001	Individual	Sam	McKenzie		Yes	SP3	No	Good afternoon, I'm disappointed that the consultation process is far too complicated for me to effectively express my views and I can't imagine I'm the only one finding it challenging! Therefore I have set out my response to your plan below: The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our	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	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	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF,	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery,	N

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								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			housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable	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.					especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	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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								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			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'								

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								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			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								

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								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			Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect								

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								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			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								

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								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			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								

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								ure 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			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								

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								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			without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is								

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								Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps			excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the								

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

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								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			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								

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								shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the								

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											Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local								

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											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								

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											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. 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									

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

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											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								

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											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								

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											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								

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											infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth								

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											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								

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											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								

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											adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0015-0002	Individual	Sam	McKenzie		Yes	Forward	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful	No	Not Stated			Not Stated		No		Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								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											

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								found unsound on procedural grounds alone.											
0577-0001	Individual	Debbie	McQuade		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	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 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	N

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											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								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 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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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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 transport improvement projects identified in the Local Transport Plan.	
0577-0002	Individual	Debbie	Mcquade		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site	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	N

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											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.						environment for local residents	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. 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.	

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0577-0003	Individual	Debbie	McQuade		Yes	Foreword					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 on this matter has been published and the					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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											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.								

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0601-0001	Individual	Jenny	McQuade		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0601-0002	Individual	Jenny	McQuade		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					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	N

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											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.							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. 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.	

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0601-0003	Individual	Jenny	McQuade		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
1204-0001	Individual	Daphne	McQuade			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	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	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 Castle Point's approach to the site review is outlined	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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 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	

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											3316 urban homes for Canvey is not resident led							SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1204-0002	Individual	Daphne	McQuade			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1204-0003	Individual	Daphne	McQuade			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
0039-0001	Individual	Stephen	McQuillan		Yes	Had4	Not Stated	Dear Castle Point Plan, I wish to object to the building of 114 homes at Had4 Land of Scrub Lane. This land, owned by Essex council, was to be developed as a new school.	Not Stated	Not Stated		Considering the amount of homes planned in Hadleigh, 402, and the possibility of more new homes in the future, it would make more sense to build a new school on this site, where it could share the adjacent playing field. I understand the need for more homes but school places in close vicinity, walking distance, of these homes is crucial,	Not Stated		No		Objects to the building of 114 homes at Had4 Land of Scrub Lane. This land, owned by Essex council, was to be developed as a new school. There is only one infants and primary school in Hadleigh, these schools are situated next to this area. Considering the amount of	Comments noted. Current education needs have been informed by the Infrastructure Delivery Plan (IDP) and in liaison with the Education Authority at Essex County Council.	N

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								There is only one infants and primary school in Hadleigh, these schools are situated next to this area.				especially as the "Plan" is to discourage the use of cars.					homes planned in Hadleigh, 402, and the possibility of more new homes in the future, it would make more sense to build a new school on this site, where it could share the adjacent playing field. I understand the need for more homes but school places in close vicinity, walking distance, of these homes is crucial, especially as the "Plan" is to discourage the use of cars.		

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0498-0001	Individual	Joyce	Meadows		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0498-0002	Individual	Joyce	Meadows		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					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	N

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											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.							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. 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.	

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0498-0003	Individual	Joyce	Meadows		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
0006-0001	Individual	Anne	Meecham		Yes	SP3	Not Stated	I have lived on Canvey for [REDACTED] a lovely place back then with a thriving Town centre and also a quaint nice looking place to live....fast forward to now and it has become just a glorified housing estate with now numerous flats going up everywhere, the flats	Not Stated	Not Stated			Not Stated		No		Long-term resident objects to overdevelopment on Canvey Island, citing loss of character, access, lack of infrastructure, flood risk, and ignored open space evidence.	Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding Flood risk covered in policies and the	N

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								aren't a bad thing as we need accommodation for youngsters first step on the property ladder but we are becoming overburdened. So when I read that there is a proposal for 3.000+ more buildings coming (I had to go back and read that again in shock) !! We cannot possibly take any more, as everyone says before me, there is ONE roundabout to get off here, (since I moved here in 1970s) we have been promised another road off not from the										supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Open Space standards set by Policy Infra3 and supported background evidence (Open Space Assessment 2022)	

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								roundabout somewhere else!.From about 1.30pm we are gridlocked coming onto the Island, awhile back we used to have emergency places to go to if there was an emergency on Canvey, see that has evaporated , well apart from swimming there would be no way off the Island especially if you are disabled!! Everytime we have a downpour there is about a foot of water laying on the road surface.! So more											

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								building means even more surface water, the drains just cannot cope but you know this already!! We need open greenland spaces for mental chill out times, it is so important especially now with so much going on in our lives, we have lost so much already... I'm sure if the powers that be could find a way to build on the sea they would!....Please don't take away our remaining bits of land it is just so unfair to put most of the											

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								proposed buildings on to our Island... What was the point in doing that extensive/expensive survey a few years ago about open spaces and how it affects us if you are going to just ignore that outcome!!											
1026-0001	Individual	Lisa	Megegnis		Yes	SP3	No	I don't know the legal side of this but it's not fair I don't see how that can be legal to be so obviously biased and just doing what a certain party wanted at the election rather than do what's right for people on Canvey and in	No	Effective, Justified	Canvey is the worst place in Castle Point to build so many houses. Although I think we have to take our fair share, what the council has proposed is not fair at all. What justification is there for putting most of the houses on an island which has ONE traffic point where all 40 thousand of us have to go	Spread the houses out more fairly, so areas that have better infrastructure take more or even better, build new infrastructure instead of just making Canvey your dumping ground without any real improvements.	No	Not Answered	Not Answered		Doesn't want so many houses on canvey Flood risk on canvey Infrastructure	Comments noted 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	N

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								Castle Point as a whole.			through rather than Castle Point where you have multiple real exits? Our one point is Waterside roundabout with two roads off for all of us what if there is an emergency like a flood? We lost a school (old Castle View) on the island but now we're going to add thousands of extra people where are they supposed to go? Are there any council houses that are going to be built or will they all be expensive houses that local people can't afford? You should start again and do it FAIRLY so that everyone takes their fair share not just dump it all on Canvey!								management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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0961-0001	Individual	Dina	Mehdi		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley Doesn't fulfil government's housing requirements.	No	Justified, Consistent with national policy	The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. I agree with the policy for the Had2 area. If the plan is unsound, then Hadleigh Green belt is at risk from	Add North West Thundersley site 187 hectares as a Green belt/Grey belt/Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 and Hadleigh at 305. Total housing target of 11000.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Supports HAD2	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the 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	N

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											speculative developers.							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 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	

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																		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 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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																		Support for HAD2 Noted.	

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

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								Morrisons down to Hadleigh / Leigh on Sea boarder, which can take 10 minutes to travel 2 miles. The constraints on the Hadleigh – London Road would only compound with more houses with the development. Local roads already suffer from congestion at key junctions, which means that they may be unable to accommodate the additional traffic demands arising from significant new housing growth. Key points from your									arising from significant new housing growth. Key points from your objection include: 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the		

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								objection include: 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community . 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument See appendix 1 4. GB8 is a historic site with 1891 of history and ownership									local community, selling parcels of land for large housing developments does not serve the community - period. 5. GB8 Development would severely overload local roads and infrastructure. 6. GB8 Development would create unacceptable strain on the London Road at peak times and weekends. 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! 8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options 9. GB8 will not be affordable housing, the land will be sold		

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								under The Salvation Army, they should be keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the local community, selling parcels of land for large housing developments does not serve the community - period. 5. GB8 Development would severely overload local roads and infrastructure. 6. GB8 Development would create unacceptable strain on the London Road at peak times and									as a premium, the "builders" will build high-end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would have considerable impact on the existing local service and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration, then there is absolutely no reason or rational for the council to choose GB8.		

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								weekends. 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! 8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options 9. GB8 will not be affordable housing, the land will be sold as a premium, the "builders" will build high-end houses taking full advantage of the Thames River, Estuary									If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of "plotlands" north of the Benfleet urban area on the junction of A127/ A130/ A1245. The Council could aim to achieve the amount of housing set out in the Government's standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require		

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								views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would have considerable impact on the existing local service and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration									approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £400,000 that’s £1.3 billion pounds of sales. TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western		

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								on, then there is absolutely no reason or rational for the council to choose GB8. If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of "plotlands" north of the Benfleet urban area on the junction of A127/ A130/ A1245. There are existing low density industrial units and homes									edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout. In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure and community needs.		

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								within this area. WHY: Development of the GB16 (160Ha) site in Northwest Thundersley should be the council's strategic option for housing development. Here's a breakdown of the key points and rationale: 1. Minimal Impact on Local Services and Infrastructure: o Developing the GB16 site would have limited impact on local roads, high streets, schools (both primary and secondary) , children's nurseries, and											

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								medical services (doctors/dentists). Due to the site's location, it is not in an area of high congestion or near densely populated community centres. 2. Proximity to Major Roads (A13 and A127): o Easy access to major roads such as the A13 and A127 is highlighted as a key advantage. These routes would provide convenient transportation links for new residents, reducing strain on smaller local roads and possibly avoiding											

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								further traffic congestion in Hadleigh town centre. 3. Government Housing Targets: o The GB16 site, with its 160 hectares of land, would help meet the government's housing targets for new builds. 4. Large Plot of Land: o The GB16 plot is larger than what is potentially required, as the council has indicated a need for 120 hectares. This surplus of space could provide additional opportunities for developers to include community											

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								benefits such as green spaces, infrastructure improvements, or other amenities. 5. Opportunity for Large Developers : o Major property developers like Redrow, Taylor Wimpey, Barratt, Bellway, Persimmon , are likely candidates for this project. Given their significant profits, it is argued they should reinvest in the community , potentially funding new schools, parks, and other facilities as part of the											

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								development. 6. Green Belt Consideration: o While green belt land is generally protected, the argument acknowledges that if green belt development is necessary, GB16 offers a suitable option due to its size and potential benefits to the area. 7. Win-Win: o The case that the GB16 site could be developed responsibly, with minimal negative impact on existing local infrastructure and services, while also providing											

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								an opportunity for developers to contribute to community improvements makes for a good argument. This could be a win-win for both the council in meeting its housing obligations and for the developers in building large-scale projects. Reference consultation document. Quote: "issues-and-options-consultation-document-final-web-version" Page 52; Option 3 – Release significant Green Belt land to meet standard methodology											

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								gy housing need “The Council could aim to achieve the amount of housing set out in the Government’s standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered” GB16 @ 160Ha,											

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								could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £400,000 that’s £1.3 billion pounds of sales. To award such a large housing development to a national British housebuilder, the council would have some negotiating “power” to get some											

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								significant contribution from the builder to spend on the community . GB16 could actual be development like the “Beaulieu” neighbourhood in Chelmsford, off White Hart Lane / A1016. Every time I travel to Stanstead this estate development always impresses me! TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land											

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								community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure and community needs.											

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0257-0001	Individual	Hayley	Mener		Not Stated	SP3	Not Stated	I strongly object any type of building and planning on the Salvation Army Field: GB8 and any of the other sites in Hadleigh. The capacity of the local infrastructure is already at breaking point. Monday to Friday during the hours of people going to work and the school runs and, on the weekends, it can be absolute grid lock from Morrisons down to Hadleigh / Leigh on Sea. The constraints on the Hadleigh – London Road	Not Stated	Not Stated			Not Stated		No	A	Objects to any type of building and planning on the Hadleigh Salvation Army Field: GB8. The capacity of the local infrastructure is already at breaking point, particularly Monday to Friday during the hours of people going to work and the school runs, and, on the weekends, it can be absolute grid lock from Morrisons down to Hadleigh / Leigh on Sea boarder, which can take 10 minutes to travel 2 miles. The constraints on the Hadleigh – London Road would only compound with more houses with the development. Local roads already suffer from congestion at key junctions, which means that they may be unable to accommodate the additional traffic demands	Comments noted	N

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								would only compound with more houses with the developments proposed. Local roads already suffer from congestion at key junctions, so would be impossible to accommodate the additional traffic demands arising from 2500 new houses. Key points for objection include: * 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. * 2. GB8 is a									arising from significant new housing growth. Key points from your objection include: 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the		

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								place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. * 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument See appendix 1 * 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt. The Salvation Army acquired the land to serve the local community									local community, selling parcels of land for large housing developments does not serve the community - period. 5. GB8 Development would severely overload local roads and infrastructure. 6. GB8 Development would create unacceptable strain on the London Road at peak times and weekends. 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! 8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options 9. GB8 will not be affordable housing, the land will be sold		

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								, selling parcels of land for large housing developments would destroy the natural beauty that the community enjoys and the wildlife habitat. * 5. GB8 Development would severely overload local roads and infrastructure. The roads are already full of pot holes which would only get worse, the council can't keep up with repairs as it is. * 6. GB8 Development would create unacceptable strain on the small residential roads &									as a premium, the "builders" will build high-end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would have considerable impact on the existing local service and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration, then there is absolutely no reason or rational for the council to choose GB8.		

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								London Road especially at peak times and weekends causing stress in the community. * 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! * 8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options such as GB16 which has the benefit of A127 & isn't disrupting anyone									If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of "plotlands" north of the Benfleet urban area on the junction of A127/ A130/ A1245. The Council could aim to achieve the amount of housing set out in the Government's standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require		

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								* 9. I doubt GB8 will offer affordable housing, the “builders” will likely build high-end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! * 10. GB8 development would have considerable impact on the existing local services, dentists, doctors and schools; The King John School, Hadleigh Junior									approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £400,000 that’s £1.3 billion pounds of sales. TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western		

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								School, Hadleigh Infants and Nursery School & Wrstwood are already at full capacity. Doctors and dentist clinics that are already over subscribed and not taking on any new patients and the waiting times for an EMERGENCY appointment is currently 6 weeks at the dentist! If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. Development of the									edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout. In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure and community needs.		

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								GB16 (160Ha) site in Northwest Thundersley should be the council's obvious option for housing development. Here's a breakdown of the key points and rationale: * 1. Minimal Impact on Local Services and Infrastructure: o o Developing the GB16 site would have limited impact on local roads, high streets, schools (both primary and secondary), children's nurseries, and medical services (doctors/dentists). Due to the											

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								site's location, it is not in an area of high congestion or near densely populated community centres so services would be more widely spread. * 2. Proximity to Major Roads (A13 and A127): o o Easy access to major roads such as the A13 and A127 is highlighted as a key advantage. These routes would provide convenient transportation links for new residents, reducing strain on smaller local roads and possibly avoiding											

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								further traffic congestion in Hadleigh town centre. * 3. Government Housing Targets: o o The GB16 site, with its 160 hectares of land, would help meet the government's housing targets for new builds. * 4. Large Plot of Land: o o The GB16 plot is larger than what is potentially required, as the council has indicated a need for 120 hectares. This surplus of space could provide additional opportunities for developers to include community											

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								benefits such as green spaces, infrastructure improvements, or other amenities such as its own health centre. * 5. Opportunity for Large Developers : o o Major property developers like Redrow, Taylor Wimpey, Barratt, Bellway, Persimmon , are likely candidates for this project. Given their significant profits, it is argued they should reinvest in the community , potentially funding new schools, parks, and											

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								other facilities as part of the development. * 6. Green Belt Consideration: o o While green belt land is generally protected, the argument acknowledges that if green belt development is necessary, GB16 offers a suitable option due to its size and potential benefits to the area. * 7. Win-Win: o o The case that the GB16 site could be developed responsibly, with minimal negative impact on existing local infrastructure and											

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								services, while also providing an opportunity for developers to contribute to community improvements makes for a good argument. This could be a win-win for both the council in meeting its housing obligations and for the developers in building large-scale projects. Reference consultation document. Quote: "issues-and-options-consultation-document-final-web-version" Page 52; Option 3 – Release significant Green Belt land to											

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								meet standard methodology housing need “The Council could aim to achieve the amount of housing set out in the Government’s standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be											

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								delivered” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £300,000 that’s £1 billion pounds of sales. ONE: GB16 Northwest of Thundersley 160 Ha collection of “plotlands” north of the Benfleet urban area											

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								on the junction of A127/ A130/ A1245. There are existing low density industrial units and homes within this area. TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western edge of											

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								Benfleet urban area and the A130, south of the Sadlers Farm roundabout. In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure.											

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								ure and community needs.											

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0280-0001	Individual	Mertuza	Merchant	t Rida London Ltd T/A Urban Blaze	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	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 title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre's which is except for connect packaging 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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											to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. I am certainly more confused now! Where am I going to be re-homed? This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it's OK to treat us the MTE business community with total						largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors nor CPBC co-opted Deyton Bell. Fact this property 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		

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											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.						attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to the local economy. • It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many		

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																	website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Questions over consistency with CPBC Regeneration policies		
0165-0001	Individual	Theresa	Merlane		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to NOT be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be UNSOUND. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes, reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, and a total housing target of 11,000.	Not Stated		No	A	The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", All our precious Greenbelt sites need total protection from government intervention. it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and North West Thundersley site. Adding the North West Thundersley site as an	Green Belt/Grey belt covered under policy GB2. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											build 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,						alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		

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											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.								
0892-0001	Individual	Theresa	Merlane		Yes	Whole Plan	No		No				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is not legally compliant	Comment noted.	N
0121-0001	Individual	Susannah	Miles		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider	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	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 Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape

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								the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			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.						predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure . The 3,316+ urban homes for Canvey is not resident led.								
0121-0002	Individual	Susannah	Miles		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures .	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0309-0001	Individual	Matthew	Miller		Yes	SP3	No	Dear Sir/Madam , This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally	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,	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	No		No		Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point, and site selection Ignores Greenbelt / Grey Belt against new NPPF guidelines. NPPF guidelines	<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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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								compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			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	Charfleets Industrial Estate site from the plan. Total housing target of 11,000.					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 number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Charfleets Industrial estate: It's inclusion as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting	the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDS</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). <u>Charfleets Industrial Estate</u> is included within Policy E1 which includes the statement ' the Council will seek to	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA) .

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											Island's unique geography and drainage infrastructure, the 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						property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic	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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											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						regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.		

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											justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.								
0309-0002	Individual	Matthew	Miller		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		Failed to consider strategic alternatives like North West Thundersley No credible five-year housing land supply. Ignores Greenbelt / Grey Belt against new NPPF guidelines. North West Thundersley site excluded NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for	<u>Housing Supply</u> : See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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																	Canvey Island's unique geography and drainage infrastructure, The proposed 3316 urban homes for Canvey is not resident led. The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Charfleets Industrial estate inclusion as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site. The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant	addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). <u>Charfleets Industrial Estate</u> is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other	Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

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																	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.	'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	
1062-0001	Individual	Jessica	Miller		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1075-0001	Individual	Karen	Miller		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1076-0001	Individual	Lydia	Miller		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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1024-0001	Individual	Alison	Millin		Yes	SP3	No	I do not believe that there has been sufficient engagement with areas in the vicinity of Castle Point to make agreements on infrastructure, agreements that would be beneficial to our borough. It does not provide sufficient housing supply to comply with targets set by government.	No	Positively prepared, Effective, Justified, Consistent with national policy	The plan does not provide evidence to explain why it believes that the government target cannot be met, in fact a huge shortfall in housing numbers. The blinkered approach of not building on greenbelt land, repeated ad nauseam, with no consideration of areas which may technically be described as greenbelt but in fact are scruffy and/or mixed use and semi-industrial, is not at all a sound approach. The glaring omission is the area in NW Thundersley. The issue of access has been viewed as an insurmountable problem	- increased use of brownfield sites - positive approach and fuller appraisal to NW Thundersley including proper co-operation with ECC. This is a key solution: incorporating existing green spaces whilst providing quality housing and infrastructure, thereby protecting true greenbelt against speculative development and resisting attempts to increase density on Canvey Island	No	Not Answered	Not Answered		Not meeting housing targets infrastructure North West Thundersley Flooding on Canvey	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point 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	N

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											rather than efforts made to engage with ECC to find a solution. The online behaviour of some councillors in this respect has been unacceptable, with photographs of field but none of the industrial areas. Any comments highlighting the possibility of incorporating this area within the plan have been pounced on, often with residents being subject to ridicule and even bullying in late-night rants. This is not a positive preparation of a plan, far from it. Falling so short of government targets immediately								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 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	

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											renders the plan ineffective. The numbers proposed for Canvey Island make this plan completely unjustified. An area which is already lives under a continual threat of flood due to its low elevation and complex drainage issues, cannot flourish with additional housing at the levels proposed. A storm or high tide would easily cause the failure of drainage solutions.							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.	

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0609-0001	Individual	Lesley	Mills		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	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 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	N

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											total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not residential. 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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0609-0002	Individual	Lesley	Mills		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					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	N

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											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.							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. 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.	

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0609-0003	Individual	Lesley	Mills		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
0673-0001	Individual	Lee	Mills		Yes	Whole Plan	No		No	Justified			No	Not Answered	Not Answered		Castle Point Plan is not sound or legally compliant	Comments Noted.	N
0065-0001	Individual	Karen	Mils		Yes	Whole Plan	Yes	Dear Sir/ Madam , I support the Castle Point plan regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. . I consider the draft plan to be sound .	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
1348-0001	Individual	J	Milton			Hou5					The Hou5 Policy states, new park homes will only be supported on		No				Policy HOU5 should make provision for improved site environment for	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											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.						the local residents		
1348-0002	Individual	J	Milton			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	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 should 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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic

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											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.							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 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	Flood Risk Assessment (SFRA).

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																		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, 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	

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																		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 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	

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																		have been considered through the SFRA.	
1348-0003	Individual	J	Milton			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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0380-0001	Individual	John	Minkey		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh	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 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	N

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											Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development,							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 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	

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											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 support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation								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 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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											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.							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 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. 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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0492-0001	Individual	Janet	Mitchell		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0492-0002	Individual	Janet	Mitchell		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					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	N

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											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.							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. 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.	

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0492-0003	Individual	Janet	Mitchell		Yes	Fore word					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 on this matter has been published and the					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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											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.								
0881-0001	Individual	Ann	Mitchell		Yes	SP3	No	Legally compliant or not, Canvey Island's infrastructure is unable to cope with the proposed new builds.	No	Effective	How is Canvey supposed to cope with all the new housing when we are already over populated? Drainage and access on and off the Island is already stretched.	Sound drainage and infrastructure and another road off the Island are vital.	No	Not Answered	Not Answered	A	Flood Risk on Canvey Infrastructure Third Road on Canvey	Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and	N

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																		supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Third Road on Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to 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.	
1166-0001	Individual	Irene	Mitchell			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	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	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 Castle Point's approach to the site review is outlined	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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 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	

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											3316 urban homes for Canvey is not resident led							SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1166-0002	Individual	Irene	Mitchell			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1166-0003	Individual	Irene	Mitchell			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
1339-0001	Individual	Janet	Mitchell			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		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

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
											improves the overall site environment for the local residents.								
1339-0002	Individual	Janet	Mitchell			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	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 should 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 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	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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											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.							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 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 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	

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																		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 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.	
1339-0003	Individual	Janet	Mitchell			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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1202-0001	Individual	John	Mogford			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	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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 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						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	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 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1202-0002	Individual	John	Mogford			Hou5		The plan has included Thorney Bay development for 173 homes, so									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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								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.											
1202-0003	Individual	John	Mogford			C4					The number of Canvey West homes puts residents in the East at risk with emergency						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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											evacuation procedures.						living at East Canvey		
0705-0001	Individual	Graham	Montford		Yes	SP3	Yes		No	Positively prepared, Effective, Justified	Canvey Island lacks the infrastructure to support this proposed development plan for another 3500 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 poor 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 or during non peak travel time Canvey Island is already susceptible to flooding. This	No further development should take place until an additional road is established as an alternative exit from Canvey Island & sufficient drainage improvements are made within the infrastructure.	No	Not Answered	Not Answered	A	Third Road onto Canvey Flooding on Canvey Infrastructure	Third Road off Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, 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	N

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											development would impose an intolerable burden on the current drainage system.							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). 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,	

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																		including in relation to Canvey.	
0705-0002	Individual	Graham	Montford		Yes	SP3	Yes		No	Positively prepared, Effective, Justified	Canvey Island lacks the infrastructure to support this proposed development plan for another 3500 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 poor entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams	No further development should take place until an additional road is established as an alternative exit from Canvey Island & sufficient drainage improvements are made within the infrastructure.	No	Not Answered		A	Third Road onto Canvey Flooding on Canvey Infrastructure	Third Road off Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan	N

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											for extended periods, even in the absence of any incidents or during non peak travel time Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system.							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 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	

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																		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.	
0705-0003	Individual	Graham	Montford		Yes	SP3	Yes		No	Positively prepared, Effective, Justified	Canvey Island lacks the infrastructure to support this proposed development plan for another 3500 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 poor entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams	No further development should take place until an additional road is established as an alternative exit from Canvey Island & sufficient drainage improvements are made within the infrastructure.	No	Not Answered		A	Third Road onto Canvey Flooding on Canvey Infrastructure	Third Road off Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan	N

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																		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.	
0705-0004	Individual	Graham	Montford		Yes	SP3	Yes		No	Positively prepared, Effective, Justified	Canvey Island lacks the infrastructure to support this proposed development plan for another 3500 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 poor entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams	No further development should take place until an additional road is established as an alternative exit from Canvey Island & sufficient drainage improvements are made within the infrastructure.	No	Not Answered		A	Third Road onto Canvey Flooding on Canvey Infrastructure	Third Road off Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan	N

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											for extended periods, even in the absence of any incidents or during non peak travel time Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system.							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 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	

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																		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.	
1149-0001	Individual	Barbara	Montgomery			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	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	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	<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.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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
								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.			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						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	<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 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	

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											Canvey is not resident led							circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1149-0002	Individual	Barbara	Montgomery			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									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
								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1149-0003	Individual	Barbara	Montgomery			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
1234-0001	Individual	James	Montgomery			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	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	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					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 less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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
								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.			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	housing target of 11,000.					site selection 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	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 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	

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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							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. Canvey SuDS options have been considered through the SFRA.	
1234-0002	Individual	James	Montgomery			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									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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								weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1234-0003	Individual	James	Montgomery			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
0211-0001	Individual	Julie	Moon		Yes	Whole Plan	Yes	I would just like to inform you that I find the new Castlepoint draft plan to be legally prepared and sound and am happy for my details to be published and shared with The	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N

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								inspector if required.											
1130-0001	Individual	Pat	Moore			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	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 predetermined towards a "no Greenbelt build 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	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led						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	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 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.	
1130-0002	Individual	Pat	Moore			Hou5		The plan has included Thorney Bay developme									Policy HOU5 should make provision for improved site environment for	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								nt 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.									the local residents		
1130-0003	Individual	Pat	Moore			C4					The number of Canvey West homes puts residents in the East at						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. 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
											risk with emergency evacuation procedures.						those residents living at East Canvey		
1377-0001	Individual	Sharon	Moran			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.		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

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
1377-0002	Individual	Sharon	Moran			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	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 should 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 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	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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											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.							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 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	

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																		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 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	

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																		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 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.	
1377-0003	Individual	Sharon	Moran			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
1378-0001	Individual	Philip	Moran			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park		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

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
											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.								
1378-0002	Individual	Philip	Moran			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	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 should 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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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											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.							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 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	Assessment (SFRA).

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																		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, 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	

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																		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 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	

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																		have been considered through the SFRA.	
1378-0003	Individual	Philip	Moran			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
0644-0001	Individual	Richard	Morgan		Yes	SP3	No	Falls well short of the government targets.	No	Positively prepared, Effective, Justified, Consistent with national policy	Not enough houses. Not a fair spread of houses throughout the borough.	Would just start again without the bias and do a fair, equitable plan for all residents.	No	Not Answered	Not Answered	A	Not enough houses Not equitably split across the Borough	Housing Numbers 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	N

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																		keeping with the NPPF when read as a whole, to deliver the standard method figure in Castle Point. More information on this can be found in the Housing Topic Paper. Site allocations All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	
1001-0001	Individual	Lucy	Morgan		Yes	HAD4	Yes		No	Justified	I would like to object to the Had4 - Land South of Scrub Lane proposal. My concerns are relating to welfare and safety of the children at Hadleigh infant and junior school not only during an construction will it be unsafe, loud and disruptive but 114 new homes on that small plot will be overlooking the children's playground and playing field. My son	Remove Had4 - Land South of Scrub Lane proposal.	Yes	Not Answered	Not Answered		Objecting to Had4 because: Traffic Parking Density 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. Density The density chosen for this site was informed by the Density and	N

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											attends that school and I would not be comfortable with the school being so overlooked. Also the area is a high traffic area as it is, especially due to it's close proximity to the school and to the high street. There is already issues with traffic here due to parked cars and traffic lights. Adding construction to this area would cause a lot of issues for all nearby residents and locals. In addition the local doctors and dentists are up to capacity and the schools oversubscribed. I strongly disagree with the proposal and object fully.							Capacity Study July 2025, please see this for further details Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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0250-0001	Individual	Anthony Shaw	Morley		Yes	SP3	No	> Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. > Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. > Remove Charfleets Industrial Estate site from the plan. > Total housing target of 11,000.	No		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											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,						urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.	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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											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								

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											engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. > > Note, I do not wish to participate at the oral examination. > I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. > Please acknowledge								

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											receipt of my submission. Kind regards Mr Anthony Shawn Morley > 31 St Marks Road > Canvey Island > Essex > SS8 9NJ >								
0250-0002	Individual	Anthony Shawn	Morley		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0100-0001	Individual	Terry	Morris		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection	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.	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 was not preferred. Green Belt/Grey belt covered under 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

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											ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique	Total housing target of 11,000.					selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts	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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											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						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.		

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											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								

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											Industrial estate for housing, with businesses integrated with residential homes.								
0100-0002	Individual	Terry	Morris		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0126-0001	Individual	Ryan	Morris		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible	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	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	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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								five-year housing land supply.			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						directed away from areas at highest risk of flooding. Sustainable Drainage 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).

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											not resident led.								
0126-0002	Individual	Ryan	Morris		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0221-0001	Individual	Georgina	Morris		Not Stated	SP3	Not Stated	Homes to be built here should be shared out in other districts and don't agree with taking over protected land and trying to change the status of that land	Not Stated	Not Stated			Not Stated		No		Homes to be built here should be shared out in other districts and don't agree with taking over protected land and trying to change the status of that land.	Comments noted	N

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0622-0001	Individual	Terence	Morris		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	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.				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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0622-0002	Individual	Terence	Morris		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		Yes				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	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
											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.							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. 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.	

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0622-0003	Individual	Terence	Morris		Yes	Fore word					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 on this matter has been published and the						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

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
											meetings were poorly advised. 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.								
1165-0001	Individual	Jacqueline	Mosedale			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	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	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 Castle Point's approach to the site review is outlined	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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 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	

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											3316 urban homes for Canvey is not resident led							SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1165-0002	Individual	Jacqueline	Mosedale			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1165-0003	Individual	Jacqueline	Mosedale			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
0970-0001	Individual	Stephen	Mountford		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0971-0001	Individual	Sally	Mountford		Yes	Whole Plan	Yes		Yes	Justified			Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0620-0001	Individual	June	Moxham		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	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				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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0620-0002	Individual	June	Moxham		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						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	N

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											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.							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. 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.	

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0620-0003	Individual	June	Moxham		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
1353-0001	Individual	June	Moxhay			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.		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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1353-0002	Individual	June	Moxhay			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	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 should 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 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	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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											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.							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 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	

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																		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 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	

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																		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 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.	
1353-0003	Individual	June	Moxhay			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
0681-0001	Individual	Ronald	Muat		Yes	HAD2	No	No building on hadleigh ("salvation army fields") farm	No		Unfair one sided Questionnaire ?	No Building on (salvation army fields) Hadleigh Farm	Yes	Not Answered	Not Answered		No building on hadleigh farm (salvation army land)	Policy HAD2 safeguards Hadleigh Farm and no development is proposed on this land	N

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0532-0001	Individual	Christopher	Murphy		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0532-0002	Individual	Christopher	Murphy		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					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	N

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											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.							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. 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.	

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0532-0003	Individual	Christopher	Murphy		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
0788-0001	Individual	John	Murphy		Yes	SP3	No	Majority of planned building in the borough on Canvey Island flood plains. Minimal planned for better suited locations. No improvement plans for ingress / egress to the island which is always gridlocked in rush hours and the whole area grids to a halt for even a	No	Positively prepared, Effective, Justified, Consistent with national policy			No	Not Answered	Not Answered		Flood Risk on Canvey Third Road onto Canvey	Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and	N

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

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																		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.	
0798-0001	Individual	Rickie	Murphy		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1346-0001	Individual	Christopher	Murphy			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.		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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1346-0002	Individual	Christopher	Murphy			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	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 should 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 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	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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											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.							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 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	

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																		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 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	

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																		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 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.	
1346-0003	Individual	Christopher	Murphy			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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0157-0001	Individual	S J	Murray		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											sites 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,						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	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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											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								

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											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.								
0157-0002	Individual	S J	Murray		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0158-0001	Individual	C J	Murray		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey SuDs options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' <i>the Council will seek to</i>	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											sites 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,						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	<i>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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											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								

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											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.								
0158-0002	Individual	C J	Murray		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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

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											flooding in winter. Currently during extended periods of wet weather large areas of South Benfleet playing fields already become unusable and should any proposed development take place in the Richmond Road car park and extend into the park area this will effectively remove a significant area of the playing fields. REDACTED we already receive text notifications regarding flood warnings from the Environmental Agency surely these warnings will only increase with any development. The potential to build 27 homes and retain the						spaces will drive the cars to park onto Richmond Avenue which already has minimal parking available with drivers parking on the pavements making it difficult for wheelchair users and parents with babies and young children. As residents who have enjoyed continuous and uninterrupted use of the rear access from our property, we would state that we have a prescriptive right to this continued access.		

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											local parking space will result in a cramped development encroaching on the playing fields and the building of flats is out of keeping for the area. The removal of the car park/a reduction in spaces will drive the cars to park onto Richmond Avenue which already has minimal parking available with drivers parking on the pavements making its difficult for wheelchair users and parents with babies and young children. As residents who have enjoyed continuous and uninterrupted use of the rear access from our property, we would state								

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											that we have a prescriptive right to this continued access. Along with the above Castle Point has recently confirmed that a transformation of Richmond Park and South Benfleet playing fields green space. With development of the houses will drive the community away from using the improved areas due to a reduction of the parking spaces along with years of ongoing building work which will create an eye sore to the projects if the building of houses was granted. We strongly oppose any development of South Benfleet playing fields.								

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0224-0002	Individual	Ellie	Murray		Yes	B7	Yes		Yes		An image is attached from Thursday 2nd October at 11:12am, where the car park is full & therefore where would these cars then be parked. This car park is used by both Parents and careers of those who attend South Benfleet Primary School, where it offers free and safe parking during the drop off/collection period. The cars would then be forced to park elsewhere as detailed in the paragraph above.		Not Stated		Yes	None	Image attached	Noted	N
0639-0001	Individual	Keith	Murray		Yes	Whole Plan	Yes		Yes		If the current plan is rejected as not providing adequate housing for the CP Local Plan then the Green belt area where		No	Not Answered	Not Answered		If more houses are needed, North West Thundersley is the better option over other Green Belt sites.	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	N

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											the Blinking Owl Cafe is located should be developed in preference to any other Green Belt area.							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.	
0330-0001	Organisation	Michael	Murrell	Basildon Council		SP3	No	1.1 Basildon Borough Council is a neighbouring local planning authority (LPA) to Castle Point and there are a number of strategic issues, such as housing and infrastructure, which have cross-boundary impacts over a number of local authority areas. It is important that such issues are addressed through	No	Positively Prepared, Justified, Consistent with National Policy, Effective	1.5 Basildon Borough Council does not believe that the Castle Point Local Plan 2026-2043 meets the tests of soundness in all of its policy areas. Positively Prepared 1.6 Castle Point Draft Local Plan does not make adequate housing provision using the Standard Method and therefore is a failure to meet the housing need of the area. The housing provision set					B - confirm formal response	Considers the local plan is not compliant or sound as the housing strategy does not meet the standard method housing need and considers that the LDS may need to be updated to provide more time for CPBC to gather more evidence. Queries the approach of urban renewal and regeneration with focus on protecting and enhancing the natural environment based on evidence including LNRS. Considers that the local plan could have used	CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements.	N

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								collaborative working and meaningful discussions in accordance with the Duty to Cooperate, the National Planning Policy Framework (NPPF), and National Planning Practice Guidance (NPPG). 1.2 It is understood that the main purpose of the consultation document is to ensure that Castle Point's Local Plan is legally compliant and meets the tests of soundness. Please be advised that for all of the consultation points below, the			out in Policy SP3 delivering a minimum of 6,196 new homes over the plan period (2026-2043) accounts to 53% of the requirement set out by the Standard method, which accounts for an unmet need of 5,466 homes. 1.7 Following the publication of the new NPPF (December 2024) Basildon Council is also required to accommodate an increased level of growth and are unable to accommodate any unmet housing need from neighbouring or nearby local authorities, including Castle Point Council. Policy SP3						some Green Belt sites for development which were highlighted in the DAC study July 2025. Does not support policy as does not meet castle point's housing need under standard methodology. Recognises that Policy SP3 exceeds the local need for based on CP's Local Housing Needs Assessment 2023. Recognises the constraints particular to Castle Point, but plan fails to identify reasonable alternatives to address the unmet housing need. Basildon states it is unable to meet any of Castle Point's Un-met housing need. Queries why grey belt sites identified by the Green Belt Assessment July	Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August 2025. Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including environmental and heritage designations, flood risk, highways issues which impact viability, sustainability	

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								Council would like to attend the future oral hearings as part of the Plan's Examination in Public. Q. Do you consider the Castle Point Plan Draft document to be legally compliant? 1.3 Basildon Borough Council does not believe that the Castle Point Local Plan 2026-2043 is compliant with necessary legislation. The National Planning Policy Framework expects strategic policy-making authorities to follow the standard			identifies a stepped housing trajectory, delivering at least 1,045 new homes in years 1 to 5, at least 1,268 new homes in years 6 to 10 and at least 3,883 new homes in years 11 to 17. The plan proposes a place-based approach to development with policy and site allocations for each of the settlement areas. The Housing Capacity Topic Paper (2025) identifies that Castle Point has capacity for 6,196 homes over the plan period, in line with Policy SP3 in the Plan. Justified 1.12 The urban renewal and regeneration approach with a focus						2025 were not taken forward in order to meet the Standard Method Housing Need.	as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Castle Point's approach to the site review is outlined in The Housing Capacity Topic Paper August 2025. Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for development as outlined in the Housing Capacity	

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								method for assessing local housing need. The standard method identifies a minimum annual housing need figure and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area (PPG Paragraph: 002 Reference ID: 2a-002-20241212) . Whilst Basildon Borough Council fully appreciates the scale of the challenge and complexity of planning for housing, the			on protecting and enhancing the natural environment has regard to national policies and regional strategies such as the Essex Local Nature Recovery Strategy (LNRS) justified through an extensive evidence base. However, Basildon Borough Council questions whether the approach was the most appropriate considering the failure to meet the standard method. 1.13 The Green Belt Assessment (July 2025) produced by DAC Planning concludes significant recommendations which the Plan has not taken into							Topic Paper August 2025. Within the NPPF Paragraph 11 section b (i) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. This includes situations where: • the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7 ; or • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding. Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that	

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								alternative approach to calculating housing need is not compliant with relevant legislation. 1.4 The revised Local Development Scheme (LDS, July 2025) identifies two months from publication of Regulation 19 to submission. The Council may need to revise the timetable to allow consultants to finalise outstanding commissioned assessments and for review of consultation responses, which may require			consideration . The assessment suggests that the Council could alter the Green Belt boundary in 16 locations, there are 12 sub-areas that are recommended for further consideration for plan-making and 19 out of 31 sub-areas assessed as constitute potential Grey Belt land. Policy GB2 states that the redevelopment of previously developed land in the Green Belt will not constitute inappropriate development when the site is in an area identified as Grey Belt. The Plan could have made provision for housing in the green belt areas as							“Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations...” The NPPF footnotes set out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas).”	

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								additional work to be carried out.			identified by DAC Planning and 34 Green Belt sites assessed in the Strategic Land Availability Assessment (SLAA 2025) in order to meet the standard method figure for housing supply. Consistent with National Policy 1.14 Castle Point's Local Housing Needs Assessment 2023 identifies the Council's objectively assessed housing need to be 255 dwellings per annum or 5,100 dwellings over 2023-2043. Overall, the Plan seeks to provide for a minimum of 6,196 homes over the plan period at an annual average of 354 new								

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											homes per annum. Whilst Policy SP3 provides for the local need for housing as per the evidence base assessment, the plan deviates from the national Standard Method. The current Standard Method (November 2024 NPPF) for Castle Point is 686 new dwellings per annum, equating to 11,662 over the Plan period. 1.15 Paragraph 6.58 states the exceptional circumstances as justification for failure to meet the Government housing targets as set out by the revised Standard Method.								

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											Whilst, Basildon Council understands the constraints particular to Castle Point, the plan is not consistent with national policy and fails to identify reasonable alternatives to address the unmet housing need.								
0330-0002	Organisation	Michael	Murrell	Basildon Council		Forward	Not Stated	1.11 Basildon Borough Council believes that it has a proactive working relationship with Castle Point Council demonstrated by the ongoing	Not Stated							B - confirm formal response	There are no DtC issues	Noted	N

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								regular programme of Duty to Cooperate meetings, where any emerging cross boundary issues are fully discussed and addressed by both councils.											
0330-0003	Organisation	Michael	Murrell	Basildon Council		E1	No	1.8 Policy E1 and E2 sets out how the Council will meet their employment needs as identified in the Economic Land Demand forecast produced by Experian (2024) for a net demand of 4,000m2 additional office floor space, which can be met by current oversupply of potential 9.5 ha based	No	Positively Prepared, Justified, Consistent with National Policy, Effective	1.10 Whilst the Infrastructure Delivery Plan (IDP 2025) produced by DAC Planning concludes that there are no significant issues or concern identified which could have an impact on the strategy of the emerging Castle Point Plan, the methodology was based on three growth scenarios previously identified in the Regulation 18 draft plan. It is understood that an					B - confirm formal response	Notes that CP can meet its employment needs and there is an oversupply	Noted	N

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								against extant permissions.			addendum will be carried out to provide an update to the document, Basildon Council considers it essential that Castle Point update the IDP accordingly to take full account of the urban renewal and regeneration approach proposed in the Regulation 19 Plan. Therefore, it is vital that the IDP is updated to ensure that sufficient provision for the delivery of new infrastructure is made to support the proposed level of growth.								
0330-0004	Organisation	Michael	Murrell	Basildon Council		Whole Plan	No	The revised Local Development Scheme (LDS, July 2025) identifies two								B - confirm formal response	BDC considers that the Local Development Scheme may need revising due to required additional work Basildon	Should it be required the Local Development Scheme will be updated. BBC has only provided comments with regards soundness for policy SP3. It is	N

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								months from publication of Regulation 19 to submission. The Council may need to revise the timetable to allow consultants to finalise outstanding commissioned assessments and for review of consultation responses, which may require additional work to be carried out. Basildon Borough Council does not believe that the Castle Point Local Plan 2026-2043 meets the tests of soundness in all of its									Borough Council does not believe that the Castle Point Local Plan 2026-2043 meets the tests of soundness in all of its policy areas.	unclear on what basis BBC considers all other policy areas to be unsound.	

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								policy areas.											
0330-0005	Organisation	Michael	Murrell	Basildon Council		IDP	No	Whilst the Infrastructure Delivery Plan (IDP 2025) produced by DAC Planning concludes that there are no significant issues or concern identified which could have an impact on the strategy of the emerging Castle Point Plan, the methodology was based on three growth scenarios previously identified in the Regulation 18 draft plan. It is understood that an addendum	Not Stated	Not stated						B - confirm formal response	Considers that the IDP needs to be updated to include the amended housing strategy in the Reg 19 plan which included the additional growth proposals at Canvey Island	Additional work has been undertaken to the IDP to reflect the additional growth proposals at Canvey Island.	N

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								will be carried out to provide an update to the document, Basildon Council considers it essential that Castle Point update the IDP accordingly to take full account of the urban renewal and regeneration approach proposed in the Regulation 19 Plan. Therefore, it is vital that the IDP is updated to ensure that sufficient provision for the delivery of new infrastructure is made to support the proposed level of growth.											

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0648-0001	Individual	Derek	Murton		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	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Answered	Yes	C	Not meeting the Governments Standard Method Figure. Ignores Green/Grey Belt Add in North West Thundersley Concerns of Flood Risk on Canvey Concerns of evacuation on Canvey	Standard Method Housing Target 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. More information on this can be found in the 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	N

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											directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.							greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the	

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																		site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to	

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																		Canvey. Evacuation procedures The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	
0648-0002	Individual	Derek	Murton		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	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	HOUSING MODIFICATIONS: Added 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-	No	Not Answered		C	Policy C7 is not effective because it lacks clear delivery mechanisms and ongoing maintenance commitments 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	N

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											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. An unsound plan will put all Greenbelt sites at risk to speculative	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.							

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											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 residents 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								

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											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 sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving Canvey Lake - delivering increased capacity								

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											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								

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											Canvey Lake continue to increase.								
0802-0001	Individual	Kathleen	Murton		Yes	SP3	No	Failure to consider alternatives, i.e. 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, it doesn't meet the housing target for Castle Point and site selection ignores green belt/grey belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a 'no green belt build policy'. Site selection is based on 'over development of Brownfield sites'. Not considered	Add North West Thundersley site, 187Ha, a Green belt/Grey belt/Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Answered	Not Answered	A	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 around Castle Point, including improved linkages to other areas. Growth in	N

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											all sites, no Green belt/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 the unique geography and drainage infrastructure of Canvey Island. The 3316 urban homes for Canvey is not resident led. Canvey West homes put residents in the East at risk with emergency evacuation procedures.							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 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	

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																		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 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	

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																		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 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. Alternative Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	
1106-0001	Organisation	Diana	Nagobi	National Highways		Whole Plan	Not Stated		Not Stated	Not Stated	National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway					B - see 1106-003 and 1106-004	National Highways network does not extend to the Castle Point Plan area. The nearest access points to the SRN (M25 Junction 29 and Junction 30 and the A13/A1089 junction) are approximately 12 miles from the Castle Point	Noted	N

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											authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. This plan focuses on the site allocations and key policies for the Castle Point Plan area over the period of 2026 to 2043. Our network does not extend to the Castle Point Plan area. The nearest access points to the SRN (M25 Junction 29 and Junction 30 and the A13/A1089 junction) are approximately 12 miles from the						boundary, via the A127 and A13 respectively. Given the locations of the development, NH anticipate that much of the traffic generated would be contained within the Castle Point boundary and the surrounding area.		

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											Castle Point boundary, via the A127 and A13 respectively. Given the locations of the development, we anticipate that much of the traffic generated would be contained within the Castle Point boundary and the surrounding area.								
1106-0002	Organisation	Diana	Nagobi	National Highways		C5	Not Stated		Not Stated	Not Stated	Whilst it is unlikely that the development would generate significant new trips on the A13 and M25, we note that Policy C5 is focused on improving access to and around Canvey Island. It is acknowledged that the A13 and A130 are key access points into Canvey Island and that the junctions and a feasibility					B - see 1106-003 and 1106-004	We note that Policy C5 is focused on improving access to and around Canvey Island. It is acknowledged that the A13 and A130 are key access points into Canvey Island and that the junctions and a feasibility study will be carried out to identify their options for improving access to, from and within Canvey Island, including its wider strategic implications.	Noted. Although Government Departments are mentioned in C5(2) it is agreed that National Highways warrants specific mention. Clarifying mod proposed to Policy C5 '2. This will be prepared in collaboration with key partners including ECC, adjoining district and unitary councils, Transport East, National Highways , Government departments such as the DfT, BEIS and MHCLG and relevant agencies as well as engagement with the local community.	Y

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											study will be carried out to identify their options for improving access to, from and within Canvey Island, including its wider strategic implications. Some key collaboration partners are identified although National Highways is not mentioned specifically. Within paragraph 2.1 our Memorandum of Understanding, Castle Point state their intention to engage with us in the study, to include the preparation of the brief with the aim of ensuring that any areas of concerns raised by National Highways are explored within the						Some key collaboration partners are identified although National Highways is not mentioned specifically. Within paragraph 2.1 our Memorandum of Understanding, Castle Point state their intention to engage with us in the study, to include the preparation of the brief with the aim of ensuring that any areas of concerns raised by National Highways are explored within the study. We agreed that that the exception to a requirement for a Strategic Transport Assessment (STA) will be when a new access road to Canvey Island comes forward and an STA will be required at that stage to assess the impacts that a new access to		

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											study. We agreed that that the exception to a requirement for a Strategic Transport Assessment (STA) will be when a new access road to Canvey Island comes forward and an STA will be required at that stage to assess the impacts that a new access to Canvey Island would have on the SRN. We ask that National Highways are engaged and included in any future consideration of a new access to Canvey Island. We look forward to continued engagement with Castle Point Borough Council as the transport evidence base for the Local Plan is developed and would expect the						Canvey Island would have on the SRN. We ask that National Highways are engaged and included in any future consideration of a new access to Canvey Island. We look forward to continued engagement with Castle Point Borough Council as the transport evidence base for the Local Plan is developed and would expect the transport assessment for the Local Plan to identify if there is any potential for impact on the SRN and associated need for mitigation measures. We also look forward to being consulted on any planning applications that have the potential to impact the SRN in the future.		

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											transport assessment for the Local Plan to identify if there is any potential for impact on the SRN and associated need for mitigation measures. We also look forward to being consulted on any planning applications that have the potential to impact the SRN in the future.								
1106-0003	Organisation	Diana	Nagobi	National Highways		Whole Plan	Not Stated		Not Stated	Not Stated	National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network					None	Following a review of the CPP Regulation 19 Consultation document (July 2025), we are satisfied that this consultation does not directly impact National Highways or our network. However, we look forward to being consulted on any planning applications that have the potential to impact the SRN in the future. We look forward to	Noted	N

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											(SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. The SRN does not extend to the CPP area. We note that the nearest SRN junction is the A13/A1089 in Grays to the southwest of the consultation plan area. Junctions 29 and 30 of the M25 are located further to the west. Following a review of the CPP Regulation 19 Consultation document (July 2025), we are satisfied that this consultation does not directly impact National Highways or						continuing to participate in future consultations and discussions.		

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											our network. However, we look forward to being consulted on any planning applications that have the potential to impact the SRN in the future. Thank you for consulting National Highways. We look forward to continuing to participate in future consultations and discussions.								
1106-0004	Organisation	Diana	Nagobi	National Highways		C5	Not Stated		Not Stated	Not Stated	We have reviewed the CPP 2026-2043 Regulation 19 Draft, dated July 2025, which focuses on the site allocations and key policies for the CPP area over the period of 2026 to 2043. We note that Policy C5 is focused on improving access to and around Canvey					None	We have reviewed the CPP 2026-2043 Regulation 19 Draft, dated July 2025, which focuses on the site allocations and key policies for the CPP area over the period of 2026 to 2043. We note that Policy C5 is focused on improving access to and around Canvey Island. The policy states that a feasibility study will be carried out to identify options	Noted	N

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											Island. The policy states that a feasibility study will be carried out to identify options for improving access to, from and within Canvey Island, including its wider strategic implications. In the future, should a proposal come forward to provide improved transport links from Canvey Island to the A130 / A13, we ask that National Highways are included in those discussions and consulted throughout the process.						for improving access to, from and within Canvey Island, including its wider strategic implications. In the future, should a proposal come forward to provide improved transport links from Canvey Island to the A130 / A13, we ask that National Highways are included in those discussions and consulted throughout the process.		

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1196-0001	Individual	Norman	Neild			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	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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 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						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	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 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1196-0002	Individual	Norman	Neild			Hou5		The plan has included Thorney Bay development for 173 homes, so									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
								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.											
1196-0003	Individual	Norman	Neild			C4					The number of Canvey West homes puts residents in the East at risk with emergency						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

ID Ref	Individual/Organisation/Agent ?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent ?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why ?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											evacuation procedures.						living at East Canvey		
0139-0001	Individual	Shelley	Neill		Yes	SP3	No	Dear Sir/Madam , I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											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.						homes puts residents in the East at risk with emergency evacuation procedures.		
0139-0002	Individual	Shelley	Neill		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures .	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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
0890-0001	Individual	Shelley	Neill		Yes	SP3	No		No	Effective, Justified	Canvey Island does not have the relevant transport links or infrastructure to allow for the plan. Whoever planned this has never sat in the traffic on a daily basis or seen the effect even minor roadworks or an accident can cause on Canvey and all surrounding areas. How is it justified that Canvey would be having the vast majority of new homes built in it. It is already overpopulated with very little in the way of shopping facilities, schools, health facilities.		No	Not Answered	Not Answered		Transport Infrastructure	Transport The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access 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 Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects	N

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																		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).	
1078-0001	Individual	Samantha	Netterton		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0177-0001	Individual	Desmond	Neville		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing	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 predetermine	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								land supply.			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. 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.						directed away from areas at highest risk of flooding. Sustainable Drainage 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).

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

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											'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.						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.		
0178-0002	Individual	Wendy	Neville		Yes	C4	No	Canvey West homes puts residents in the East at risk with	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								emergency evacuation procedures.									evacuation procedures		
0118-0001	Individual	Rachel	Newcombe		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											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.						resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0118-0002	Individual	Rachel	Newcombe		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures .	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0418-0001	Individual	A	Newman		Yes	Whole Plan	N/A	Not Stated	Yes		Those responsible for preparing the draft have recognised, addressed and attempted to provide workable solutions to the challenges and problems faced in Castle Point whilst complying with the NPPF. Specifically: The need to build more homes, the high density of population and homes already in Castle Point far exceeding most of Essex, the excessive congestion on roads and excessive loading on public transport in the area, failure by successive governments to construct a third road on to Canvey Island,alread						Castle Point Plan is sound and thanks to officers for addressing the concerns of residents	Support noted.	N

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											y identified high risk of flooding across Castle Point and adjoining Basildon by the retention of Green Belt along the A130 corridor, The need to retain Green Belt as an area for recreation and to provide facilities tenable this including Horse Stabling and horse riding which currently exist, are extensively used by residents and add to the desirability of living in this area. As a resident in Castle Point for over 50 years I'd like to register my gratitude to the current team preparing the draft for acting on the concerns of the majority								

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											of residents in Castle Point.								
1245-0001	Individual	Thomas	Newton			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-	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state	<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 of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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
								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.			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						development should 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>Thundersley Northwest</u> Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</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.	
1245-	Individual	Thomas	Newton			Hou5		The plan has included									Policy HOU5 should make provision for	Comments noted. Policy HOU5 does not restrict improvement	N

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0002								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.									improved site environment for the local residents	to the sites environment	
1245-	Individual	Thomas	Newton			C4					The number of Canvey West homes						Development at West Canvey will impact	The safety of all Castle Point residents is a priority and has been	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
0003											puts residents in the East at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	considered within the Castle Point Plan	
0362-0001	Individual	John	Nichols		Yes	SP3	No	There is no infrastructure to be in place to build 3,100 homes on Canvey Island. No 3RD road on and off the island	No	Positively Prepared							There is no infrastructure to be in place to build 3,100 homes on Canvey Island. No 3RD road on and off the island	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
0894-0001	Individual	Emma	Noakes		Yes	SP3	No	The plan doesn't consider other alternatives like North West Thundersley.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no greenbelt build policy", it is solely based on the "over development	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5	N

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											of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever							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 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	

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											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, puts 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,							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, 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	

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											archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0420-0001	Individual	Lamiece	Noonan		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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0421-0001	Individual	Michael	Noonan		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0776-0001	Individual	Brenda	Norman		Yes	SP3	No	What a [REDACTED] load of gobaldegook [REDACTED] Due To Personal Information] Let me say in plain English , if I am allowed, this [REDACTED] island is already overcrowded, it can't take anymore houses , [REDACTED] stop building, Is this [REDACTED] plain enough for you [REDACTED] .	No				Yes	Not Answered	Not Answered		No Houses Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read 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	N	

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																		Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.	
1206-0001	Individual	Brian	Norman			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.	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 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	<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 of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			predetermined towards a "no Greenbelt build 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						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	All reasonable options 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 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	

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																		ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1206-0002	Individual	Brian	Norman			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1206-0003	Individual	Brian	Norman			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
1220-0001	Individual	Janet	Norman			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	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	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					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 less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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	housing target of 11,000.					site selection 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	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 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	

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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							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. Canvey SuDS options have been considered through the SFRA.	
1220-0002	Individual	Janet	Norman			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									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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								weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1220-0003	Individual	Janet	Norman			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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0580-0001	Individual	Valerie	Norris		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	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 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	N

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											total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not residential. 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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0580-0002	Individual	Valerie	Norris		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					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	N

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											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.							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. 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.	

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0580-0003	Individual	Valerie	Norris		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
1380-0001	Individual	Mrs V	Norris			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.		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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1380-0002	Individual	Mrs V	Norris			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	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 should 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 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	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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											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.							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 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	

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																		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 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	

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																		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 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.	
1380-0003	Individual	Mrs V	Norris			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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0056-0001	Individual	Linda	Norton		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk,	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	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	Not Stated		No		A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites, protecting a cherished part of our landscape and heritage. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. Lack of access in and out of the Borough, only three routes. Duty to Cooperate - Absence of clear and binding	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. North West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. Hazardous Industries: Policy SD8 covers Development near Hazardous Uses. Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA) .

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								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			Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to	investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.					agreements on cross-boundary infrastructure and housing distribution. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to more in depth SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments.	consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds. Canvey SuDs covered in policy and SFRA but further proposed. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	

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								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			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						However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to		

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								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			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						the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events,		

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								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				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					biodiversity, and recreational value. Its protection is essential.		

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								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			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								

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								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			mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high								

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								reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the			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								

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								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			be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far								

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								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			more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised								

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								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,			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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								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			cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3								

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								public interest.			filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are								

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											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								

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											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								

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											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								

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											of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style								

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											specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently								

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											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.								

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											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									

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											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								

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											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								

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											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								

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											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								

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											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								

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

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								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											

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								found unsound on procedural grounds alone.											
0419-0001	Individual	Paul	Norton		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0341-0001	Organisation	Janet	Nuttall	Natural England		Vision	Yes	Thank you for your consultation on the above dated 01 August 2025. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development	Yes							A	Natural England welcome the reference to multi-functional green infrastructure (GI) in the Vision but advise that the protection of existing nature conservation sites and adherence to nature recovery priorities should be included. Natural England support objectives 2, 3 and 4 relating to multi-functional GI and biodiversity networks but we strongly advise including an objective to protect and enhance nature conservation sites.	Addition to Vision point 3 as follows: Natural assets are protected and nature recovery is prioritised. Green spaces in local areas will be pleasant places to rest and play and will be connected into the wider network of multi-functional green infrastructure, providing opportunities to connect with nature.	Y - Addition to Vision point 3 as follows: Natural assets are protected and nature recovery is prioritised. Green spaces in local areas will be pleasant places to rest and play and will be connected into the wider network of multi-functional green infrastructure, providing opportunities to connect with nature.

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								nt. The Castle Point Plan 2026-2043 Regulation 19 Draft July 2025 We consider the Plan to be generally 'sound' on matters within Natural England's statutory remit for the natural environment. However, our comments below include advice around amendments to policy wording, for clarity around Habitats Regulation matters and/or to strengthen consistency with national planning policy, as set out in the National											

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								Planning Policy Framework (NPPF). Vision & Objectives We welcome the reference to multi-functional green infrastructure (GI) in the Vision but advise that the protection of existing nature conservation sites and adherence to nature recovery priorities should be included. We support objectives 2, 3 and 4 relating to multi-functional GI and biodiversity networks but we strongly advise including an objective to protect and											

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								enhance nature conservation sites.											
0341-0002	Organisation	Janet	Nuttall	Natural England		SP1	Yes	We welcome the support for the delivery of the Essex Local Nature Recovery Strategy (LNRS) and the new opportunities to deliver multi-functional GI and wider benefits. However, please note that protecting coastal areas to enable improved access will need to be delivered sensitively to ensure that the notified interest features of international	Yes		The management of any new and enhanced green infrastructure should be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Natural England recommends that green infrastructure delivered within (or associated with) major new developments should be managed, maintained and monitored for a minimum of 30 years					A	Natural England welcome the support for the delivery of the Essex Local Nature Recovery Strategy (LNRS) and the new opportunities to deliver multi-functional GI and wider benefits. However, please note that protecting coastal areas to enable improved access will need to be delivered sensitively to ensure that the notified interest features of internationally important coastal sites are not adversely impacted by additional recreational pressure. We welcome the reference in the	Modification to Policy SP1 agreed Protecting the function of the Borough's Green Belt and coastal areas by supporting opportunities to enable improved access, health and wellbeing and leisure infrastructure, for the overall enjoyment of residents, subject to sensitive consideration of environmental assets including internationally important coastal sites and ensuring they are not adversely impacted by recreational pressure. 5. The management of any new and enhanced green infrastructure must be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Green infrastructure	Y - Modification to Policy SP1 agreed Protecting the function of the Borough's Green Belt and coastal areas by supporting opportunities to enable improved access, health and wellbeing and leisure infrastructure, for the overall enjoyment of residents, subject to sensitive consideration of environmental assets including internationally important coastal sites and ensuring they are not

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

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0341-0003	Organisation	Janet	Nuttall	Natural England		SP2	Yes	Please note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy.	Yes							A	Please note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy.	Modifications agreed <u>Modification to Policy SP2</u> 3d. Support integrated access to public open space, and the enhancement of the multi-functional green infrastructure network and biodiversity to offer a range of health, and environmental benefits; <u>Modification to Reasoned Justification</u> 6.30 As the density of the urban areas increases within the Borough, the need to protect and enhance access and existing environmental assets to make the best use of local open spaces and protect urban biodiversity becomes more acute. By opening up access to a wide range of facilities, residents and visitors will have an increased choice about when and how often they use local green assets.	Y - <u>Modification to Policy SP2</u> 3d. Support integrated access to public open space, and the enhancement of the multi-functional green infrastructure network and biodiversity to offer a range of health, and environmental benefits; <u>Modification to Reasoned Justification</u> 6.30 As the density of the urban areas increases within the Borough, the need to protect and enhance access and existing environmental assets to make the best use of local open spaces and protect urban biodiversity

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																			becomes more acute. By opening up access to a wide range of facilities, residents and visitors will have an increased choice about when and how often they use local green assets.
0341-0004	Organisation	Janet	Nuttall	Natural England		SP3	Yes	6.47 A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage in order to demonstrate no adverse effects on site integrity – we consider that this could be worded more clearly as follows: ‘A Habitats Regulations Assessment	Yes							A	6.47 A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage in order to demonstrate no adverse effects on site integrity – we consider that this could be worded more clearly as follows: ‘A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application	<u>Modification to supporting paragraph</u> 6.47 A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage ~~in order to~~ and will need to demonstrate no adverse effects on site integrity before development can be granted permission. Same modifications to the following paragraphs: 8.16, 8.26, 8.40, 8.72, 8.78, 9.23, 11.17, 13.46,14.28, 14.49, 17.8, 17.26, 18.16, 19.56, 20.30,	<u>Modification to supporting paragraph</u> 6.47 A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage ~~in order to~~ and will need to demonstrate no adverse effects on site integrity before development can be

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								t will be required for windfall sites on Canvey Island at application stage and will need to in order to demonstrate no adverse effects on site integrity before development can be granted permission'. We advise replacing the former sentence with this wording wherever it occurs throughout the document under different locations.									stage and will need to in order to demonstrate no adverse effects on site integrity before development can be granted permission' . We advise replacing the former sentence with this wording wherever it occurs throughout the document under different locations.	20.40 and 21.32 as set out in the Schedule of Modifications and the Natural England 'Statement of Common Ground'.	granted permission. Same modifications to the following paragraphs: 8.16, 8.26, 8.40, 8.72, 8.78, 9.23, 11.17, 13.46,14.28, 14.49, 17.8, 17.26, 18.16, 19.56, 20.30, 20.40 and 21.32
0341-0005	Organisation	Janet	Nuttal	Natural England		SP4	Yes	We welcome the inclusion of green and blue infrastructure (GI) in this policy.	Yes							A	We welcome the inclusion of green and blue infrastructure (GI) in this policy.	Support noted	N

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0341-0006	Organisation	Janet	Nuttall	Natural England		C1	Yes	We are pleased to see reference to Essex Local Nature Recovery Strategy (LNRS) in this and other place-based policies.	Yes							A	We are pleased to see reference to Essex Local Nature Recovery Strategy (LNRS) in this and other place-based policies.	Modification to Policy C1(14) Policy C1(14). Development proposals must satisfy the requirements of the habitats regulations and 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).	Yes. Modification to Policy C1(14) Policy C1(14). Development proposals must satisfy the requirements of the habitats regulations and 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).
0341-0007	Organisation	Janet	Nuttall	Natural England		C3	Yes	Natural England notes the potential for development or redevelopment of the facilities at this site and are pleased that Castle Point recognise	Yes							A	Natural England notes the potential for development or redevelopment of the facilities at this site and are pleased that Castle Point recognise the importance of ensuring any proposals of this nature must be in line with relevant nature	Support noted	N

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								the importance of ensuring any proposals of this nature must be in line with relevant nature conservation legislation to avoid impacting any nearby protected sites.									conservation legislation to avoid impacting any nearby protected sites.		
0341-0008	Organisation	Janet	Nuttall	Natural England		C4	Yes	8.39 states that 'development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents'. This will need careful consideration	Yes							A	Policy C4 - West Canvey	8.39 states that 'development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents'. This will need careful consideration to ensure that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development. Please note that assessments on	8.39 Furthermore, it is expected that the development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents,

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								on to ensure that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development. Please note that assessments on SSSIs are separate considerations from impacts on international sites which are carried out under the Habitats Regulations as mentioned in 8.40.										SSSIs are separate considerations from impacts on international sites which are carried out under the Habitats Regulations as mentioned in 8.40. However, further mods are proposed, as follows: 8.39 Furthermore, it is expected that the development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents, whilst ensuring that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development. <u>Modifications to Policy:C4</u>	whilst ensuring that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development. <u>Modifications to Policy:C4</u> 9. Appropriate links into multi-functional green infrastructure to the west of the site whilst avoiding adverse harm to biodiversity through recreational impacts, or other impacts arising from urban development. 9) Well-designed

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																		9. Appropriate links into multi-functional green infrastructure to the west of the site whilst avoiding adverse harm to biodiversity through recreational impacts, or other impacts arising from urban development. 9) Well-designed alternative SANG, to help alleviate pressure on the Essex Coast habitats 10) A strategy that minimizes impacts upon the SSSI and does not impede LNRS aims of connectivity; via sensitive consideration of siting, buffers, lighting and noise. Residential development should be located with suitable buffers and in less sensitive parts of the site to	alternative SANG, to help alleviate pressure on the Essex Coast habitats 10) A strategy that minimizes impacts upon the SSSI and does not impede LNRS aims of connectivity; via sensitive consideration of siting, buffers, lighting and noise. Residential development should be located with suitable buffers and in less sensitive parts of the site to avoid

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																		avoid adverse impacts 11) Enhancements that complement the designated features and features of interest of Canvey Wick SSSI. Redevelopment of the adjacent 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.	adverse impacts 11) Enhancements that complement the designated features and features of interest of Canvey Wick SSSI. Redevelopment of the adjacent 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/san

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																			dbanks and use of waste material such as crushed concrete in gabion baskets.
0341-0009	Organisation	Janet	Nuttall	Natural England		C5	Yes	We suggest the following changes to the policy wording in point 4 as follows: 'Options in the feasibility study for improvements to access to Canvey Island will be subject to Habitats Regulations Assessment and will need to	Yes							A	We suggest the following changes to the policy wording in point 4 as follows: 'Options in the feasibility study for improvements to access to Canvey Island will be subject to Habitats Regulations Assessment and will need to demonstrate to ensure	<u>Modification</u> 4. Options in the feasibility study for improvements to access to Canvey Island will be subject to Habitats Regulations Assessment that will need to demonstrate to ensure there is no adverse effect on integrity to ensure there is no resulting harm to internationally protected sites'.	<u>Modification</u> 4. Options in the feasibility study for improvements to access to Canvey Island will be subject to Habitats Regulations Assessment that will need to demonstrate to ensure there is no

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								demonstrate to ensure there is no adverse effect on integrity to ensure there is no resulting harm to internationally protected sites'.									there is no adverse effect on integrity to ensure there is no resulting harm to internationally protected sites'.		adverse effect on integrity to ensure there is no resulting harm to internationally protected sites'.
0341-0010	Organisation	Janet	Nuttall	Natural England		C6	Yes	We welcome the place-based policies focused on protecting important areas of greenspace and their connectivity across the district, e.g. Daws Heath (DH1), Thundersley (Thun4) and the Green Lung (C6). We support the general aims of these policies to improve the connectivity and condition	Yes							A	We welcome the place-based policies focused on protecting important areas of greenspace and their connectivity across the district, e.g. Daws Heath (DH1), Thundersley (Thun4) and the Green Lung (C6). We support the general aims of these policies to improve the connectivity and condition of the GI network and its habitats, and address deficiencies in access to greenspace. Policy C6 - The South Canvey Green Lung We support	Support noted	N

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								of the GI network and its habitats, and address deficiencies in access to greenspace. Policy C6 - The South Canvey Green Lung We support policy C6 to protect the South Canvey Green Lung as an important asset for people and nature, and its aims to align with the Essex LNRS and seek opportunities to create new habitat (e.g. through BNG) wherever possible.									policy C6 to protect the South Canvey Green Lung as an important asset for people and nature, and its aims to align with the Essex LNRS and seek opportunities to create new habitat (e.g. through BNG) wherever possible.		
0341-0011	Organisation	Janet	Nuttal	Natural England		Thun 4	Yes	We are pleased to see reference to 'projects to promote the	Yes							A	We are pleased to see reference to 'projects to promote the continued improvement of the local wildlife	Support noted	N

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								continued improvement of the local wildlife sites and Thundersley Great Common SSSI and recovery of its currently unfavourable condition'.									sites and Thundersley Great Common SSSI and recovery of its currently unfavourable condition'.		
0341-0012	Organisation	Janet	Nuttall	Natural England		DH1	Yes	We are pleased to see reference to 'projects to promote the continued improvement of the local wildlife sites and SSSIs (Garrold's Meadow and Great Wood and Dodd's Grove) and recovery of sections that are in an unfavourable condition'.	Yes							A	We are pleased to see reference to 'projects to promote the continued improvement of the local wildlife sites and SSSIs (Garrold's Meadow and Great Wood and Dodd's Grove) and recovery of sections that are in an unfavourable condition'.	Support noted	N

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0341-0013	Organisation	Janet	Nuttall	Natural England		D3	Yes	Paragraph 16.38 states that masterplans should reflect the policy requirements of the Local Plan. In line with Policy SP1 and the wider Plan vision, this should include the need for multifunctional green infrastructure. The masterplan offers an opportunity to outline how GI has been integrated into a scheme to create high-quality, sustainable places. It will also ensure that GI is considered from the outset as an important piece of infrastructure in new	Yes							A	Paragraph 16.38 states that masterplans should reflect the policy requirements of the Local Plan. In line with Policy SP1 and the wider Plan vision, this should include the need for multifunctional green infrastructure. The masterplan offers an opportunity to outline how GI has been integrated into a scheme to create high-quality, sustainable places. It will also ensure that GI is considered from the outset as an important piece of infrastructure in new development s.	<u>Modifications</u> 16.38 The Council will work with those promoting development, the local communities and infrastructure providers to ensure that Master Plans accurately reflect the vision and the policy requirements in this Plan but also local aspirations and preferences concerning layout, style, character and relationship to adjoining land uses. 16.39 In line with the wider plan vision, the masterplan offers an opportunity to outline how multifunctional green infrastructure has been integrated into a scheme to create high-quality, sustainable places. It will also ensure that GI is considered from the outset as an important piece of	<u>Modifications</u> 16.38 The Council will work with those promoting development, the local communities and infrastructure providers to ensure that Master Plans accurately reflect the vision and the policy requirements in this Plan but also local aspirations and preferences concerning layout, style, character and relationship to adjoining land uses. 16.39 In line with the wider plan

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								developments.										infrastructure in new developments	vision, the masterplan offers an opportunity to outline how multifunctional green infrastructure has been integrated into a scheme to create high-quality, sustainable places. It will also ensure that GI is considered from the outset as an important piece of infrastructure in new developments

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0341-0014	Organisation	Janet	Nuttall	Natural England		ENV1	Yes	We recommend including a reference to National Character Areas and Local Landscape Character Assessment areas (where datasets for these are available) Natural England - National Character Area Profiles - National Character Area Profiles.	Yes							A	We recommend including a reference to National Character Areas and Local Landscape Character Assessment areas (where datasets for these are available) Natural England - National Character Area Profiles - National Character Area Profiles.	<u>Modification: New paragraph in Policy ENV1</u> 4. Development proposals should be designed to reflect character, features and priorities of established Landscape Character Areas and landscape assessments. <u>Modification: New Reasoned Justification Paragraph</u> 18.6 The Natural England National Landscape Character Areas, as well as local Essex Landscape Character Assessments provide a way of understanding how the landscape and its elements contribute to local character, sense of place, and local distinctiveness can be preserved and enhanced. Canvey and	<u>Modification: New paragraph in Policy ENV1</u> 4. Development proposals should be designed to reflect character, features and priorities of established Landscape Character Areas and landscape assessments. <u>Modification: New Reasoned Justification Paragraph</u> 18.6 The Natural England National Landscape Character Areas, as well as local

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																		southern areas of the Borough form part of the Thames Estuary Landscape Character Area, while northern parts of the Borough form part of the Northern Thames Basin/South Essex Coastal Towns Landscape Character Area	Essex Landscape Character Assessments provide a way of understanding how the landscape and its elements contribute to local character, sense of place, and local distinctiveness can be preserved and enhanced. Canvey and southern areas of the Borough form part of the Thames Estuary Landscape Character Area, while northern parts of the Borough

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																			form part of the Northern Thames Basin/South Essex Coastal Towns Landscape Character Area
0341-0015	Organisation	Janet	Nuttal	Natural England		ENV2	Yes	Natural England welcomes the strategic approach set out in Policy ENV2 with regards to coastal management and will review the Riverside Strategy HRA when this is available. We would encourage Castle Point to explore potential nature-based solutions to coastal and flood management as these can create opportunities	Yes							A	Natural England welcomes the strategic approach set out in Policy ENV2 with regards to coastal management and will review the Riverside Strategy HRA when this is available. We would encourage Castle Point to explore potential nature-based solutions to coastal and flood management as these can create opportunities for environmental enhancement that may help to mitigate any potential impacts on	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. 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
								es for environmental enhancement that may help to mitigate any potential impacts on protected sites or act as compensatory measures should these be required.									protected sites or act as compensatory measures should these be required.		

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0341-0016	Organisation	Janet	Nuttall	Natural England		ENV3	Yes	We agree that 'Where appropriate, large scale residential developments within the Zones of Influence will be required to provide sustainable accessible natural greenspace (SANG) or SANG-like provision'. This should be defined as providing a minimum of 8Ha per 1000 new population of accessible semi-natural greenspace with a minimum 2.7km circular walk on-site or on-site and making use of the existing	Yes							A	We agree that 'Where appropriate, large scale residential developments within the Zones of Influence will be required to provide sustainable accessible natural greenspace (SANG) or SANG like provision'. This should be defined as providing a minimum of 8Ha per 1000 new population of accessible semi-natural greenspace with a minimum 2.7km circular walk on-site or on-site and making use of the existing Public Rights of Way network. Note that the Essex Coast Recreational Disturbance	<u>Modification: Addition to Policy ENV3 paragraph 1a and b</u> a. Applying the principles related to the ~~biodiversity~~ mitigation hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy, ~~In Castle Point~~, including ancient woodlands are considered to constitute irreplaceable habitats b. Where appropriate, large scale residential developments (500 units + or equivalent) within the Essex Coast Zone of Influence will be required to provide sustainable Suitable Accessible Natural Greenspace (SANG) or SANG-like provision. This should be defined as providing a minimum of 8Ha	<u>Modification: Addition to Policy ENV3 paragraph 1a and b</u> a. Applying the principles related to the ~~biodiversity~~ mitigation hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy, ~~In Castle Point~~, including ancient woodlands are considered to constitute irreplaceable habitats b. Where appropriate, large scale residential developme

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								Public Rights of Way network. Note that the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) is in the process of being updated (section 18.23) and the supporting text should refer to future iterations of this strategy. We are pleased to see reference to SSSIs. Given point 1a covers irreplaceable habitats and SSSIs, should it refer to the mitigation hierarchy rather than the biodiversity									Avoidance and Mitigation Strategy (RAMS) is in the process of being updated (section 18.23) and the supporting text should refer to future iterations of this strategy. We are pleased to see reference to SSSIs. Given point 1a covers irreplaceable habitats and SSSIs, should it refer to the mitigation hierarchy rather than the biodiversity hierarchy which prioritises steps for BNG delivery (onsite first, offsite, and statutory credits as a last resort)?	per 1,000 new population of accessible semi-natural greenspace with a minimum 2.3km circular walk on-site. Alternatively, developments may be able to contribute to the uplift an existing greenspace (e.g. a Country Park) to SANG standard. and making use of the existing Public Rights of Way network. <u>Modification:</u> <u>Paragraph 18.23</u> 18.23 A Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has been prepared for the Essex Coast Habitats Sites to address this cooperatively across Essex. This, together with any future updated iterations, sets out a series of actions to be taken to avoid	nts (500 units + or equivalent) within the Essex Coast Zone of Influence will be required to provide sustainable Suitable Accessible Natural Greenspace (SANG) or SANG-like provision. This should be defined as providing a minimum of 8Ha per 1,000 new population of accessible semi-natural greenspace with a minimum 2.3km circular walk on-site. Alternatively, developments may be able to contribute

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								hierarchy which prioritises steps for BNG delivery (onsite first, offsite, and statutory credits as a last resort)? We welcome point 1d(ii) and the 20% target for development on greenfield land. This aligns with the wider Essex ambitions for 20% Biodiversity Net Gain to support nature recovery and delivery of the LNRS. We welcome the inclusion of an Urban Greening Factor in the Plan. The UGF can work									We welcome point 1d(ii) and the 20% target for development on greenfield land. This aligns with the wider Essex ambitions for 20% Biodiversity Net Gain to support nature recovery and delivery of the LNRS. We welcome the inclusion of an Urban Greening Factor in the Plan. The UGF can work alongside BNG, ensuring that developments provide a biodiversity / greening uplift even where the BNG baseline is low. Public realm improvements (as noted in para 16.15) would also	adverse in-combination effects upon Essex Coast Habitats Sites to these habitats. The Strategy identifies a Zone of Influence (ZOI) around each Habitats sites in Essex where recreational disturbance is likely to result from residential development. Modification: Merge Paragraph 18.24 into 18.23 together as they both address RAMs. This allows for the creation of a new paragraph 18.24 to address SANG (see below) New para: 18.24: The RAMS tariff addresses in-combination adverse effects on the integrity of the Essex Coast Habitats Sites. However, large sites (500+) with alone adverse effects from recreational disturbance will also need to	to the uplift an existing greenspace (e.g. a Country Park) to SANG standard. and making use of the existing Public Rights-of Way network. <u>Modification:</u> <u>Paragraph 18.23</u> 18.23 A Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) has been prepared for the Essex Coast Habitats Sites to address this cooperatively across Essex.

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								alongside BNG, ensuring that developments provide a biodiversity / greening uplift even where the BNG baseline is low. Public realm improvements (as noted in para 16.15) would also offer urban greening opportunities for Castle Point.									offer urban greening opportunities for Castle Point.	mitigate via on-site SANG (Suitable Alternative Natural Greenspace) provision, as recommended by Natural England. SANGs are areas that are designated with the aim of protecting ecologically sensitive protected sites like Special Protection Area (SPA) from recreational pressures by providing alternative green space for people to visit. SANG need to conform to the latest Natural England SANG guidelines (add link to SANG guidelines on CPBC website). Where SANG or equivalent is provided, the RAMs tariff still applies, because in such cases, the Essex RAMS tariff mitigates for residual effect of these large sites, as no	This, together with any future updated iterations , sets out a series of actions to be taken to avoid adverse in-combination effects upon Essex Coast Habitats Sites to these habitats. The Strategy identifies a Zone of Influence (ZOI) around each Habitats sites in Essex where recreational disturbance is likely to result from residential development. Modificatio

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																		amount of on-site greenspace will prevent all visits to the coast, nor is that desirable. <u>New addition to Glossary</u> SANG (Suitable Alternative Natural Greenspace) - A strategically planned high quality naturalistic green space designed to draw recreational visitors away from ecologically sensitive protected sites such as SPAs (Special Protection Areas), thereby reducing development impacts. SANGs may include green or blue infrastructure and serve a multi-functional role, for example: provision of SuDS, climate change mitigation and	n: Merge Paragraph 18.24 into 18.23 together as they both address RAMs. This allows for the creation of a new paragraph 18.24 to address SANG (see below) New para: 18.24: The RAMS tariff addresses in-combination adverse effects on the integrity of the Essex Coast Habitats Sites. However, large sites (500+) with alone adverse effects from recreational

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																		enhancing public health and wellbeing.	disturbance will also need to mitigate via on-site SANG (Suitable Alternative Natural Greenspace) provision, as recommended by Natural England. SANGs are areas that are designated with the aim of protecting ecologically sensitive protected sites like Special Protection Area (SPA) from recreational pressures by providing alternative green space for people to visit.

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																			SANG need to conform to the latest Natural England SANG guidelines (add link to SANG guidelines on CPBC website). Where SANG or equivalent is provided, the RAMs tariff still applies, because in such cases, the Essex RAMS tariff mitigates for residual effect of these large sites, as no amount of on-site greenspace will prevent all visits to the coast, nor is that desirable.

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																			<u>Related Consequent Mods</u> Related Consequent Mods required to Policy C1 and Thun2, as set out in the Schedule of Mods and the Natural England Statement of Common Ground. <u>New addition to Glossary</u> SANG (Suitable Alternative Natural Greenspace) - A strategically planned high quality naturalistic green space designed to draw recreational visitors away from

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																			ecologically sensitive protected sites such as SPAs (Special Protection Areas), thereby reducing development impacts. SANGs may include green or blue infrastructure and serve a multi-functional role, for example: provision of SuDS, climate change mitigation and enhancing public health and wellbeing.
0341-0017	Organisation	Janet	Nuttal	Natural England		ENV6	Yes	We support the protection of best and most versatile agricultural land.	Yes							A	We support the protection of best and most versatile agricultural land.	Support noted	N

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0341-0018	Organisation	Janet	Nuttall	Natural England		Infra4	Yes	We support the need for standards to ensure the adequate provision of open space in Castle Point. The design of new open space should be informed by local needs and opportunities, and provision should be sufficient to meet the requirements of new communities. As a baseline, Natural England recommends a standard of 3Ha of accessible greenspace per 1000 people, with no net loss or reduction in this capacity. A higher level of	Yes							A	We support the need for standards to ensure the adequate provision of open space in Castle Point. The design of new open space should be informed by local needs and opportunities, and provision should be sufficient to meet the requirements of new communities. As a baseline, Natural England recommends a standard of 3Ha of accessible greenspace per 1000 people, with no net loss or reduction in this capacity. A higher level of provision of 8Ha of accessible greenspace per 1000 people may be needed where there are recreational pressure concerns on coastal Habitats Sites.	Broad support for open space standards noted Modifications proposed as follows: <u>New addition to Policy Infra4</u> 6. New open spaces will be required for major developments on grey belt sites and greenfield sites in the urban area, according to the Council's Open Space Needs Assessment quantity, access and quality standards. This These will be required where there is a deficiency (by quantity or access) of open space types, or where the implementation of the development itself will lead to a deficiency. The benchmark scale of development that is normally expected to provide equipped/designated open spaces on site is as follows: <u>Modification to supporting text</u> 19.52 The Castle Point Open Space Needs Assessment ~~recommends~~ standards for ensuring there is an adequate provision of open space across the Borough over the Plan period are set out below. # The assessment	Yes Broad support for open space standards noted Modifications proposed as follows: <u>New addition to Policy Infra4</u> 6. New open spaces will be required for major developments on grey belt sites and greenfield sites in the urban area, according to the Council's Open Space Needs Assessment quantity, access and quality standards. This These will be required where there is a deficiency (by quantity or access) of open space types, or where the implementation of the development itself will lead to a

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								provision of 8Ha of accessible greenspace per 1000 people may be needed where there are recreational pressure concerns on coastal Habitats Sites.										establishes quality standards for a whole range of different types of open spaces, and quantity and accessibility standards for the most common types of open space. Meeting these standards will also ensure that Natural England's 3ha/1000 population accessible greenspace standard is achieved. Add Title to Table 'Table x: Open Space Needs Assessment Quantity, and Access Standards' Delete final column in table 'Additional open space to be delivered') <u>Amendments/Additions to Supporting Text</u> 19.56 A Habitats Regulations Assessment will be required at application stage for any facility near to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked land), in order to demonstrate no adverse effects on site integrity. Where 8Ha per 1,000 new population of on-site	deficiency. The benchmark scale of development that is normally expected to provide equipped/designated open spaces on site is as follows: <u>Modification to supporting text</u> 19.52 The Castle Point Open Space Needs Assessment ~~recommends~~ standards for ensuring there is an adequate provision of open space across the Borough over the Plan period are set out below. # The assessment establishes quality standards for a whole range of different types of open spaces, and quantity and accessibility standards for the most

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																		SANG is required under Policy ENV3, this will replace the requirement for the Accessible Natural Green Space element of open space requirements detailed in Table x above. common types of open space. Meeting these standards will also ensure that Natural England's 3ha/1000 population accessible greenspace standard is achieved. Add Title to Table 'Table x: Open Space Needs Assessment Quantity, and Access Standards' Delete final column in table 'Additional open space to be delivered') <u>Amendments /Additions to Supporting Text</u> 19.56 A Habitats Regulations Assessment will be required at application stage for any facility near	

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																			to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked land), in order to demonstrate no adverse effects on site integrity. Where 8Ha per 1,000 new population of on-site SANG is required under Policy ENV3, this will replace the requirement for the Accessible Natural Green Space element of open space requirements detailed in Table x above.
0341-0019	Organisation	Janet	Nuttall	Natural England		SD1	Yes	Natural England wishes to remind Castle Point that any flood risk projects which have the potential to	Yes							A	Natural England wishes to remind Castle Point that any flood risk projects which have the potential to impact SPA features will require an HRA to ensure that	<u>Modification: Paragraph 21.18</u> Local Plan 21.18 The loss of inter-tidal marshland habitats. The Benfleet and Southend Marshes is designated as a	<u>Modification: Paragraph 21.18</u> Local Plan 21.18 The loss of inter-tidal marshland habitats.

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								impact SPA features will require an HRA to ensure that they do not damage designated features or impact SSSI species and habitats. We note the risks to biodiversity and ecology from climate change are identified in section 21.3 and welcome efforts to manage these impacts. Section 21.18 identifies the potential for intertidal marshland habitat loss that may require compensatory measures. Natural England									they do not damage designated features or impact SSSI species and habitats. We note the risks to biodiversity and ecology from climate change are identified in section 21.3 and welcome efforts to manage these impacts. Section 21.18 identifies the potential for intertidal marshland habitat loss that may require compensatory measures. Natural England would like to be consulted at the earliest stage to ensure that any compensatory measures are sufficient. We also encourage Castle Point to identify compensatory sites early as there are high levels of competition for suitable sites in and around the Thames estuary. Ideally, we	Special Protection Area (SPA) and is recognised for its assemblage of migratory birds under the Ramsar Convention. As a consequence, there is a need to identify compensatory habitat. The TE2100 Plan seeks to identify compensatory provision to account for this loss. Natural England's early input will be sought to ensure that any compensatory measures are sufficient. Habitats created as compensatory measures will require a robust long-term monitoring programme to ensure continued functionality. Any development within Hadleigh Marshes should avoid causing adverse effects on sites integrity. This will need to be demonstrated through a project	The Benfleet and Southend Marshes is designated as a Special Protection Area (SPA) and is recognised for its assemblage of migratory birds under the Ramsar Convention. As a consequence, there is a need to identify compensatory habitat. The TE2100 Plan seeks to identify compensatory provision to account for this loss. Natural England's early input will be sought to ensure that any

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								would like to be consulted at the earliest stage to ensure that any compensatory measures are sufficient. We also encourage Castle Point to identify compensatory sites early as there are high levels of competition for suitable sites in and around the Thames estuary. Ideally, we would rather flood management measures avoid the loss of designated habitat entirely, but Natural England recognise that this									would rather flood management measures avoid the loss of designated habitat entirely, but Natural England recognise that this may not be feasible given the local area. It may be necessary to explore habitat creation options as a compensatory measure and there will need to be a comprehensive plan for any such proposals including a robust long-term monitoring programme to ensure that compensatory measures are functioning effectively. Note: Similar comments were also made by NE in their response to the HRA	level Habitats Regulations Assessment.	compensatory measures are sufficient. Habitats created as compensatory measures will require a robust long-term monitoring programme to ensure continued functionality. Any development within Hadleigh Marshes should avoid causing adverse effects on sites integrity. This will need to be demonstrated through a project level Habitats Regulations Assessment.

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								may not be feasible given the local area. It may be necessary to explore habitat creation options as a compensatory measure and there will need to be a comprehensive plan for any such proposals including a robust long-term monitoring programme to ensure that compensatory measures are functioning effectively.											
0341-0020	Organisation	Janet	Nuttall	Natural England		SD9	Yes	Natural England welcomes the requirements for new development to incorporate water efficiency measures	Yes							A	Natural England welcomes the requirements for new development to incorporate water efficiency measures and achieve stringent standards. Useful reference	Reps to SD9 and supporting text as agreed with Essex County Council and set out in the Schedule of Mods and Natural England SoCG.	Y

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

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								Water Resources Plan for Eastern England. It is your authority's responsibility to determine that the Local Plan meets the statutory obligations for nature recovery, set out in Annex D of the Standards. We advise that implementation of the recommendations in the Shared Standards are one way for your authority to meet its nature recovery and protection obligations, in relation your plans for growth and water scarcity. This includes undertakin									recommendations in the Shared Standards are one way for your authority to meet its nature recovery and protection obligations, in relation your plans for growth and water scarcity. This includes undertaking an integrated water cycle study to inform the local plan and assess the need for the water efficiency measures in your LPA area to address the impacts of growth on nature recovery obligations. Recommended policy wording around water efficiency, for inclusion in Local Plans, is set out in the Shared Standards. We support the policy requirement that all new development should demonstrate that adequate foul water treatment and		

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								g an integrated water cycle study to inform the local plan and assess the need for the water efficiency measures in your LPA area to address the impacts of growth on nature recovery obligations . Recommended policy wording around water efficiency, for inclusion in Local Plans, is set out in the Shared Standards. We support the policy requirement that all new development should demonstrate that adequate foul water treatment									drainage already exists or can be provided in time to serve the development. The policy stipulates that this must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.		

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								and drainage already exists or can be provided in time to serve the development. The policy stipulates that this must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.											

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1034-0001	Individual	Sharon	O'Donoghue		Yes	SP3	No	Didn't contemplate other possibilities eg North West Thundersley. No convincing five year housing land provision.	No	Consistent with national policy	It fails to achieve housing targets, contrary to national guidelines with erroneous site selection application, It is not consistent with national policy. It doesn't meet the housing target for Castle Point, and the site selection ignores Green belt /Grey belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Green belt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Green belt	Add North West Thundersley site, 187 Ha as a Green belt, Grey belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050 and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point 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	N

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											or Grey belt sites added and the exclusion of the North West Thundersley site. I agree with Had2 Policy for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the									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 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	

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											landscape or the Greenbelt. I recognise that the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but the ill conceived plan for 6200 homes places the Hadleigh farmland site at risk to development, needing planning objections with respect to urban sprawl. It is 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								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 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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											on this site affects both Hadleigh and the neighbouring area of Leigh on Sea. I can support this Had2 Policy with no housing development on this farmland site. 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.								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 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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
1007-0001	Individual	Paul	O'Leary		Yes	SP3	Yes		No	Justified		No further building on Canvey until the road network is capable of sustaining the extra traffic that would be generated by this plan.	No	Not Answered	Not Answered		Transport capacity on Canvey Island	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	N

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																		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.	
1284-0001	Individual	Raymond	OCallaghan			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	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	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	<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.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	<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 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	

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											Canvey is not resident led							circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1284-0002	Individual	Raymond	OCallaghan			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1284-0003	Individual	Raymond	OCallaghan			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
1285-0001	Individual	Joan	OCallaghan			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	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	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					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 less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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	housing target of 11,000.					site selection 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	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 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	

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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							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. Canvey SuDS options have been considered through the SFRA.	
1285-0002	Individual	Joan	OCallaghan			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									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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								weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1285-0003	Individual	Joan	OCallaghan			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
0258-0001	Agent	Lorna	O'Carroll	Iceni OBO Richborough Commercial	Yes	E1	No	Iceni Projects ("Iceni") have significant concerns in respect of the Castle Point's employment land needs modelling, which do not accurately forecast	No	Consistent with National Policy	It is therefore concerning that the current approach taken by Castle Point does not take account of the Functional Economic Market Area (FEMA) and seek to support it. 4. These representations	As discussed within this representation, Iceni consider that Castle Point should make the following changes to their draft Local Plan prior to the submission to the Secretary of State: Review the employment evidence base to ensure that it is compliant with the PPG. Changes arising should be	Yes	Not Stated	Yes	A	<u>Economy and Employment</u> The Council's strategic employment strategy fails to meet the economic development needs of the area and similarly does not consider the implications for the wider South Essex functional economic markets.	Comments noted. <u>Employment</u> Castle Point's role within a wider South Essex economy is well recognised in the Plan and the development of new floorspace is supported. As set out in the July 2025 Employment Topic Paper - '5.1 The determination of future employment land needs for Castle Point Borough forms a central component of the	N

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								future needs and significantly underestimate the need for employment land over the plan period. The evidence is also not PPG-compliant which raises significant issues of soundness for the plan. 2. 3. At a regional level, Castle Point holds an important location within South Essex's economic geography. The Borough plays a key role in supporting the supply chain for Basildon's manufacturing and logistics			ns are framed in terms of the 'tests of soundness' in paragraph 36 of the NPPF and are supported by a Review of Employment Land Needs Evidence (Iceni, September 2025).	reflected in the strategic needs for the Borough, either through a new policy or an updated Policy E2. This review should be undertaken in consultation with adjoining authorities. The wider evidence base should also be reviewed to ensure consistency of approach. 5. • • Update Policy T2 to be consistent with national policy. 2 a. Representations 6. Iceni have been instructed by Richborough Commercial ("Richborough") to provide representations on Castle Point's Regulation 19 Draft Local Plan Consultation. 7. Richborough have an interest in the 'Land west of Canvey Way', which lies within the administrative boundary of Basildon Borough Council, however, it requires access from Canvey Way within Castle Point's administrative					The Council's evidence base that has informed the development strategy for employment is flawed for the reasons set out within these representations, and therefore the proposed strategy has not taken into account the reasonable alternative. Consistent with national policy – The evidence base being flawed and not PPG compliant demonstrates its inconsistency with national policy. A new policy, or alternatively an updated Policy E2 should be incorporated. Castle Point plays an important role in regional economy, but the current approach to employment needs set out by the Plan fails to support economic growth	<i>emerging Local Plan. This process involves a forward-looking assessment of the types and quantities of employment floorspace likely to be required over a 20-year period (2023–2043), with the intention of supporting sustainable economic growth, business investment, and job creation within the Borough. The analysis follows national guidance contained in the National Planning Policy Framework (NPPF, December 2024) and the Planning Practice Guidance (PPG), which require that planning authorities make sufficient provision for commercial development, including for different types of employment use, based on objective and proportionate evidence (see paragraph 2.2). 5.2 The employment land need forecast (– 2.02 ha net) indicates that Castle Point already has sufficient land—both designated and permitted—to meet future demand. Therefore, the Local</i>	

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								sectors, such as materials and components supplies.				boundaries. 8. The Site benefits from a draft allocation, being identified as a “potential site for employment” within the emerging Regulation 18 Basildon Local Plan (ref. E4 Land West of Canvey Way), to contribute towards meeting Basildon Borough Council’s need for “at least 65-82ha of new employment land” over the plan period to 2043.					aspirations in neighbouring authorities (i.e. Basildon). A more strategic approach needs to be taken by Castle Point. As demonstrated within the supporting Review of Employment Land Needs Evidence (prepared by the Icen Economics Team, September 2025), we have significant concerns about the Council’s position taken in respect of employment need. Through this, we therefore have fundamental concerns about the soundness of Policy SP3 as being suitable to meet the development need. Dispute findings and conclusions of Transport evidence and the Employment Topic Paper. In response to issues highlighted	<i>Plan’s strategy is to optimise and intensify existing employment land, rather than allocating new sites. 5.3 To support this assessment, the Council commissioned and adopted the Experian Economic Land Demand Forecast (September 2024). This modelled the future trajectory of employment across a range of land use classes, drawing on demographic trends, sectoral growth assumptions, local economic baselines, and commercial property market benchmarks. '</i>	

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																	around Castle Points's economy, new employment development (for example at Canvey Way) will help provide employment opportunities within Castle Point, increasing job density and reducing out-commuting. In addition, new employment development will help support target growth sectors such as advanced manufacturing and green energy, businesses which typically requiring higher-spec modern premises. Logistics and distribution space is also key in supporting the supply-chains of the target growth sectors.		

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0258-0002	Agent	Lorna	O'Carroll	Iceni OBO Richborough Commercial	Yes	Forward	No	Iceni also have significant concerns that Castle Point's Draft Local Plan fails to demonstrate effective strategic planning across local planning authority boundaries, as required by the National Planning Policy Framework, December 2024 ("NPPF"). There is also a lack of evidence to demonstrate how the Council have met their statutory duty-to-cooperate. Notwithstanding the above, it is also important to consider	No	Consistent with National Policy		Make Duty to Cooperate Reports publicly available for review to demonstrate effective cooperation and discharge of the statutory duty.	Yes	Not Stated	Yes	A	Cross-Boundary Working There is no evidence provided that the Council have based their plan on effective joint working on cross-boundary strategic matters. It is not clear that the draft Local Plan or 6 its underpinning evidence base has factored in allocations located on the Borough boundaries including land west of Canvey Way. Plan fails to support the Basildon economy.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								the importance of cross-boundary planning. Paragraphs 24 and 25 of the NPPF are clear that effective strategic planning plays a vital role in facilitating economic resilience, while joint working is integral to the production of a positively prepared and justified strategy. Paragraph 27 sets out that strategic policy-making authorities should ensure that their policies align as fully as possible including ensuring that any 5 allocation											

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								which cuts across the boundary of plan areas or has significant implications for neighbouring areas is appropriately managed by all relevant authorities. Paragraph 36 notes that plans are sound if they are based on effective joint working on cross-boundary strategic matters. 24. Even if Castle Point had a surplus of employment land (which we disagree with), Basildon Council's Employment Land Needs Assessment1 (prepared											

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								by Lichfields, February 2025) identifies that Basildon should plan for circa 8ha of office uses and a minimum of 61ha of land for industrial and distribution uses for the plan period (2023-2043). 25. Basildon and Castle Point sit at the heart of South Essex's economic geography, and the two economies have a strong interrelationship. Given its proximity and accessibility, Castle Point plays a key role in supporting											

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								the supply chain for Basildon's manufacturing and logistics sectors, with SMEs providing goods and services such as materials and components supplies. 26. The current approach taken by Castle Point fails to support the key role that the Borough has in respect of the wider regional economy and similarly fails to support growth aspirations in neighbouring authorities (i.e. Basildon). It is clear that a more strategic approach											

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								needs to be taken by Castle Point in the draft Local Plan, i.e. one that acknowledges its importance for South Essex's economic geography. 27. As a final point, it is noted within the draft Local Plan that the Council refer to having undertaken engagement with neighbouring authorities under the Duty to Cooperate, to explore whether there is potential to help Castle Point meet its housing need (Para 6.57), however this is not raised in respect of employment or											

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								commercial need. The draft Local Plan then goes on to refer to the 'Duty to Cooperate Report', however this is not available within the evidence documents. It is essential that this report is made available, so that it can be understood how the Council have approached their responsibilities regarding strategic cross-boundary planning. Without any other detailed evidence, the only conclusion that can be reached at present is that the council											

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								have failed in their Duty to Cooperate. Closing – Need and Cross Boundary 28. On the basis of above, Castle Point should therefore review their employment evidence base and changes should be reflected in the strategic needs for the Borough. A new policy should be implemented, or Policy E2 updated, to permit new employment floorspace in locations other than near town centres. While we challenge the evidence submitted											

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								by Castle Point, the NPPF is also clear that planning policies should be flexible enough to accommodate needs not anticipated in the plan (paragraph 86e), which the current policies also fail to do so. 29. Any review should be undertaken in consultation with Basildon, and other Local Authorities in the FEMA. 30. To summarise, the Council fails the tests of soundness as follows: a. Positively prepared – The Council's											

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								strategic employment strategy fails to meet the economic development needs of the area and similarly does not consider the implications for the wider South Essex functional economic markets. b. Justified – The Council's evidence base that has informed the development strategy for employment is flawed for the reasons set out within these representations, and therefore the proposed strategy has not											

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								taken into account the reasonable alternative. c. Effective – There is no evidence provided that the Council have based their plan on effective joint working on cross-boundary strategic matters. It is not clear that the draft Local Plan or its underpinning evidence base has factored in allocations located on the Borough boundaries including land west of Canvey Way. d. Consistent with national policy – The evidence base being											

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								flawed and not PPG compliant demonstrates its inconsistency with national policy. Other comments 31. The current wording of Policy T2 (Criterion 7) is not consistent with national policy, and therefore there are soundness issues with the policy as written. The Policy states “7. The Council will resist development that would impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions.” 32.											

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								National policy however sets a higher barrier in respect of transport impact, which the Council's draft policy does not reflect. Paragraph 166 of the NPPF is clear 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											

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								scenarios.’ 33. A more suitably worded policy would be “The Council will resist development that would result in an unacceptable impact on the safety of A13, A127 or A130, or associated junctions. Following mitigation, the Council will resist development where the residual cumulative impacts on the effective operation and resilience of the roads named above would be severe, taking into account all reasonable future scenarios.”											

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								In conclusion , further work should be undertaken by Castle Point prior to the submission of the draft Local Plan to the Secretary of State to review the evidence base, with a focus on the employment evidence in particular, and changes should therefore be reflected in the strategic needs for the Borough. A new policy, or alternatively an updated Policy E2 should be incorporated. 35. Castle Point plays an											

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								important role in regional economy, but the current approach to employment needs set out by the Plan fails to support economic growth aspirations in neighbouring authorities (i.e. Basildon). A more strategic approach needs to be taken by Castle Point. 36. These amendments are considered necessary to ensure that the draft Local Plan is sound and compliant with national policy.											

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0258-0003	Agent	Lorna	O'Carroll	Iceni OBO Richborough Commercial	Yes	T2	No		No	Positively prepared,	The key consideration in assessing the draft Local Plan is NPPF paragraph 36 and the tests of soundness which require them to be: “a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives,		Yes	Not Stated	Yes	A	Highways Impacts The current wording of Policy T2 (Criterion 7) is not consistent with national policy, and therefore there are soundness issues with the policy as written. The Policy states “7. The Council will resist development that would impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions.” National policy however sets a higher barrier in respect of transport impact, which the Council’s draft policy does not reflect. Paragraph 166 of the NPPF is clear that ‘Development should only be prevented or refused on highways grounds if there would be an	Highways Impacts Transport policies supported by evidence and engagement with the Highways Authority.	N

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											and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and 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.” 13. Icen consider the approach taken by Castle Point in the preparation						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.’ A more suitably worded policy would be “The Council will resist development that would result in an unacceptable impact on the safety of A13, A127 or A130, or associated junctions. Following mitigation, the Council will resist development where the residual cumulative impacts on the effective operation and resilience of the roads named above would be severe, taking into account all reasonable		

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											of the draft Local Plan, in respect of planning for employment needs fails on all four tests of soundness. Economic Development Need 14. It is noted within Policy SP3 'Meeting Development Needs' that the Council have not included any new employment land within the policy, i.e. that no additional land is required to meet employment needs over the plan period. Instead, the Plan applies a 'no net loss' principle, coupled with strategic opportunities to safeguard, modernise and intensify the four Strategic Employment Areas, rather than allocate						future scenarios."		

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											any new sites (Policy E1). 4 15. As demonstrated within the supporting Review of Employment Land Needs Evidence (prepared by the Iceni Economics Team, September 2025), we have significant concerns about the Council's position taken in respect of employment need. Through this, we therefore have fundamental concerns about the soundness of Policy SP3 as being suitable to meet the development needs in Castle Point and whether the draft local plan can be considered to be positively prepared or justified. We understand								

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											Castle Point have identified a surplus of employment uses over the plan period (Paragraph 6.36 – 6.40). It is contended that the extant permission is already committed development and therefore this overinflates the stated surplus of employment land. The Employment Land Need forecast for 2023-2043 (included within the Employment Topic Paper, July 2025) identifies a net negative requirement of B-class employment land leaving a surplus of 2ha. When combined with an extant permission at West Canvey, the Council’s position is								

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											that this could result in a surplus of 9.5ha of land supply. 17. Paragraph 15 and 16 of the NPPF are clear that plans should, amongst other things, address economic needs and contribute to the achievement of sustainable development. Paragraph 86(a) further states that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. 18. It is clear, in light of the evidence, that at the moment Castle Point have failed to do this. 19. The evidence									

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											relied on by the Council is not considered to be sound, and Iceni consider that the Council have underestimated their need. As such, the plan is not positive prepared. Notably, the Employment Topic Paper (July 2025) fails to be PPG compliant through an absence of any commercial market analysis exploring office and industrial market dynamics meaning that it is not fully justified or consistent with national policy. 20. Through analysis undertaken by Iceni, the employment need in Castle Point Borough is								

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											considered to be 11.9ha over the 2023-43 plan period, a significant increase in the evidence put forward by the Council. This has been calculated using a PPG compliant approach of alternative employment needs modelling, which is set out within the Iceni Employment Review. 21. With the failure to allocate any new sites and the actual employment need of 11.9ha, there are further ramifications in respect of the soundness of the plan. The transport evidence has been undertaken on the basis that no new employment sites will be								

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											allocated, and clearly this is flawed. The evidence base concerning transport should be updated to reflect the accurate levels of employment growth during the plan period. In the round, it is expected that transport evidence for the Castle Point draft Local Plan will take account of identified growth in the Basildon draft Local Plan, and other local planning authorities in South Essex, recognising shared connectivity and the likely impacts of growth. The draft Local Plan is not based on an appropriate strategy and therefore cannot be considered to								

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											be justified. 22. There are further concerns raised by the Iceni Economics Team. For example, the alleged intensification through vertical expansion will not provide space for new occupiers, and whilst it will allow existing businesses to grow their premises, this is unlikely to generate job creation and will more likely provide additional floorspace for storage or machinery only. Furthermore, due to the age of Castle Point's industrial stock, comprehensive redevelopment will likely be required to meet modern requirements								

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											, which might not be viable for single units. The fragmented plot patterns of the existing industrial areas are noted by the Council, and this could therefore be a barrier to redevelopment.								

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0594-0001	Individual	Gillian	O'Connor		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0594-0002	Individual	Gillian	O'Connor		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					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	N

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											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.							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. 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.	

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0594-0003	Individual	Gillian	O'Connor		Yes	Foreword					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
0768-0001	Organisation	Eileen	O'Connor	EM Radiation Research Trust	Yes	INFRA6	No	The consultation process risks breaching the Gunning Principles by failing to provide sufficient information on the health, fire, and safety risks of telecommunications infrastructure. In addition, reliance on ICNIRP self-certification, including certificates	No		See attachment for further justification. Policy Infra6 is not sound because it: Relies solely on ICNIRP guidance, which only considers thermal effects and ignores substantial evidence of non-thermal biological effects. Assumes mast sharing automatically reduces impacts, when in fact it can intensify	Modifications necessary to make the plan legally compliant and/or sound: Abandon sole reliance on ICNIRP self-certification; require independent expert certification for all telecoms infrastructure. Apply minimum setbacks: 500 m from homes, 1,000 m from schools and sensitive sites. Explicitly protect vulnerable groups (children, elderly, AIMD users, cancer survivors, electrosensitive individuals).	No	Not Answered	Yes	A	Objects to INFRA6 because: Failure to provide sufficient information health, fire and safety risks of telecommunications infrastructure Reliance on ICNIRP self certification may be unlawful - doesn't take into account non-thermal biological effects Failing to consider the needs of vulnerable groups	Health, Fire and Safety Risks These are covered under building regulations to ensure any development of this nature is safe. ICNIRP Referring to the International Commission on Non-ionising Radiation is best practice and ensures the applications submitted are regulated under this body. Failing to consider the needs of vulnerable groups The entirety of the plan has been assessed to consider the needs of vulnerable groups, please see the	2b. an assessment of whether there would be any impacts of the proposal to individuals or groups protected under the equalities act, by carrying out an Equality Impact Assessment and identifying any appropriate mitigation measures; and

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								submitted under dissolved or invalid company names, may be unlawful. The plan also risks breaching the Council's Public Sector Equality Duty (Equality Act 2010, Section 149) by failing to consider the needs of vulnerable groups such as people with medical implants and those with electromagnetic hypersensitivity (EHS).			local exposures and fire risks. Fails to apply the precautionary principle, despite WHO/IARC 2025 findings confirming carcinogenicity in animals. Fails to protect vulnerable groups (children, elderly, AIMD users, electrosensitive individuals), contrary to national equality and planning policy. Ignores legal precedents (Thomas v. Cheltenham, Skelt v. Secretary of State) confirming that ICNIRP compliance cannot negate legitimate health objections.	Require full planning scrutiny for all base stations, including those under 15 m. Prioritise fibre-to-the-premises (FTTP) broadband over wireless deployment. Apply Stewart Report recommendations, especially preventing the "beam of greatest intensity" from falling on schools. Conduct mandatory fire and structural risk assessments for all masts and small cells. Require disclosure and regulation of operating power levels, modulation types, pulsing, and the cumulative effect of multiple frequency bands, with independent monitoring and enforcement. Adopt biologically based exposure guidelines recommended by independent scientists (e.g., BioInitiative and						Equality Impact Assessment. Further to this policy INFRA 6 requires a risk assessment to be submitted. To ensure compliance with the Public Sector Equality Duty (PSED), a modification has been added for an equality impact assessment to be undertaken so that the impact on any affected groups has been consciously considered.	

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												Building Biology guidelines), which apply precautionary safety limits far below ICNIRP thresholds.							
0733-0001	Individual	John	O'Connor		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1188-0001	Individual	Pauline	Oddy			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	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	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					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 less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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	housing target of 11,000.					site selection 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	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 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	

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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							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. Canvey SuDS options have been considered through the SFRA.	
1188-0002	Individual	Pauline	Oddy			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									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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								weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1188-0003	Individual	Pauline	Oddy			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
1250-0001	Individual	Colin	ODonovan			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	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 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					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. CPBC realises that	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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	1050. Total housing target of 11,000.					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	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 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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											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led							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.	
1250-0002	Individual	Colin	ODonovan			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									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
								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.											
1250-0003	Individual	Colin	ODonovan			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

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
1251-0001	Individual	Philomena	Odonovan			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	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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 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						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	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 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1251-0002	Individual	Philomena	Odonovan			Hou5		The plan has included Thorney Bay development for 173 homes, so									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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								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.											
1251-0003	Individual	Philomena	Odonovan			C4					The number of Canvey West homes puts residents in the East at risk with emergency						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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											evacuation procedures.						living at East Canvey		
0317-0001	Individual	Brian	O'Grady			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to 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	PROPOSED MODIFICATION: Add North West Thundersley site.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey SuDs options have been considered through the SFRA. Needs of emergency services considered in the supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure . The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Infrastructure Delivery Plan (IDP).	
0317-0002	Individual	Brian	O'Grady			C4	No	Canvey West homes puts residents	No	Not Stated							The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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								in the East at risk with emergency evacuation procedures .									emergency evacuation procedures		
0748-0001	Individual	Tolomoye Donald	Okiki		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0455-0001	Individual	Derek	Oliver		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0456-0001	Individual	Jane	Oliver		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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0521-0001	Individual	Edith	Oliver		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0521-0002	Individual	Edith	Oliver		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					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	N

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											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.							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. 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.	

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0521-0003	Individual	Edith	Oliver		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
1229-0001	Individual	Mr A	Oliver			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	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	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 Castle Point's approach to the site review is outlined	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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 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	

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											3316 urban homes for Canvey is not resident led							SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1229-0002	Individual	Mr A	Oliver			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									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
								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1229-0003	Individual	Mr A	Oliver			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
1230-0001	Individual	Mrs P	Oliver			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	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	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					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 less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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	housing target of 11,000.					site selection 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	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 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	

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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							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. Canvey SuDS options have been considered through the SFRA.	
1230-0002	Individual	Mrs P	Oliver			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									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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								weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1230-0003	Individual	Mrs P	Oliver			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
0313-0001	Individual	Lucy	Olofinjana			SP3	Not Stated	Hello I am extremely concerned about any plans for building in the areas surrounding Sadlers farm roundabout, including any potential of hundreds of homes at Jotmans farm going	Not Stated	Not Stated						A	Concerned about any plans for building in the areas surrounding Sadlers farm roundabout, including any potential of hundreds of homes at Jotmans farm going onto Canary way. Canvey only has two roads in and out, so Canvey Way cannot	<u>Canvey Access</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South	N

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								onto Canary way. Canvey only has two roads in and out, so Canvey Way cannot possibly cope with extra cars from a large development. The area is already very congested when one small thing goes wrong on Canvey, Benfleet or Rayleigh. It has taken 1.5 hours in the past to travel from pitsea (my son's school) to benfleet due to traffic after an accident. Hundreds more homes cannot possibly be considered in this area.									possibly cope with extra cars from a large development. The area is already very congested when one small thing goes wrong on Canvey, Benfleet or Rayleigh.	Essex Implementation Plan	

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0626-0001	Individual	Sharon	O'Neill		Yes	C5	No	How can more building be put on sites in Town centre where people park for shopping The town centre will become obsolete leading to a loss of jobs. Also this area flooded on 2014 where is the improved infrastructure.	No	Positively prepared, Effective	We need another road off Canvey we only need 1 accident now and the whole of Canvey becomes gridlocked and with the oil refinery we are are disaster waiting to happen	I know we have to have extra houses on Canvey Island but over 2000 is unsustainable	No	Not Answered		A	Need a third road on to Canvey Dangers of Oikos	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 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	N

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																		identified in the Local Transport Plan. Oikos 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.	
1431-0001	Individual	Sharon	Oneill		Yes	SD1	No	When was the relevant flood study done this area is prone to flooding and 3000+ houses are to be built here	No	Consistent with National Policy		More studies to be done on infrastructure drains roads and flooding risks	No				More studies to be done on infrastructure drains roads and flooding risks	Infrastructure: Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding: Flood risk covered in policies SD1-3 and the supporting Strategic Flood Risk Assessment (SFRA).	N
1431-0002	Individual	Sharon	Oneill		Yes	C1	No		No	Effective			No				The Castle Point Plan in relation to policy C1 is not legally compliant	Comments noted.	N
0292-0001	Individual	Jeffrey	Osborn		Yes	Whole Plan	Yes	Dear sir/madam I support the castle point plan regulation	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N

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

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											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.						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.		
0150-0002	Individual	Jessica	Osborne		Yes	C4	No	Canvey West homes puts residents in the East	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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								at risk with emergency evacuation procedures.									evacuation procedures		
0153-0001	Individual	Janice	Osborne		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure . The 3,316+ urban homes for Canvey is not resident led.						Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0153-0002	Individual	Janice	Osborne		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures .	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0155-0001	Individual	Stephen	Osborne	Not stated	Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											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.						East at risk with emergency evacuation procedures.		
0155-0002	Individual	Stephen	Osborne	Not stated	Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures .	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0260-0001	Individual	Natalie	Osborne		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt	Add North West Thundersley site	Not Stated	Not Stated	No	A	Fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are	North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. Green Belt/Grey belt covered under policy GB2. Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in	N

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											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,						not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	the supporting Infrastructure Delivery Plan (IDP).	

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											medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not								

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											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.								
0260-0002	Individual	Natalie	Osborne		Yes	C4	No	, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated	Not Stated	No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0203-0001	Individual	Paul	Overbury		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey SuDs options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' <i>the Council will seek to</i>	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											sites 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,						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	<i>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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											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								

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											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.								
0203-0002	Individual	Paul	Overbury		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
1040-	Individual	Alan	Owens		Yes	Whole Plan	No		No	Positively prepared			Yes	Not Answered	Not Answered		Castle Point Plan is not sound.	Comments noted.	N

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0001																			
0743-0001	Individual	Aliya	Pachy		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0744-0001	Individual	Nanine	Pachy		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0550-0001	Individual	Frances	Packham		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	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 increases in housing delivery to be set out and agreed in plans,	N

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											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 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								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 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	

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											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 Canvey's residents are of the same opinion.							Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the 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 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. 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	

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																		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 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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0550-0002	Individual	Frances	Packham		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 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		N

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																		Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0550-0003	Individual	Frances	Packham		Yes	Foreword					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					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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											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.								
1381-0001	Individual	Mrs F	Packham			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		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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											which improves the overall site environment for the local residents.								
1381-0002	Individual	Mrs F	Packham			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	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 should 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 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	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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											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.							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. 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	

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																		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 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	

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																		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 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.	
1381-0003	Individual	Mrs F	Packham			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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0285-0001	Individual	Karen	Page		Yes	SP3	No	Dear Sir/Madam I do not support the castle point plan regulation 19 draft consultation. I do not consider the draft plan to be legally compliant. Reason : It fails to consider strategic alternatives like North West Thundersley. It has no credible 5 year housing land supply.	No	Justified, consistent with national policy	I do Not consider the draft plan to be sound Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for castle point. The site selection ignores green belt / grey belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a “no green belt build policy”. The site selection is based on the “over development of brown field sites”. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the	Proposed Modification: Add North west thunderously site.	Not Stated		No		Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure.	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). 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 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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											exclusion on 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 Islands unique geography and drainage infrastructure . The 3316+ urban homes for Canvey is not resident led.							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.	
0285-0002	Individual	Karen	Page		Yes	C4	No	Canvey west homes puts residents in the east at risk with emergency evacuation procedures .	No	Not Stated			Not Stated		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.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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1171-0001	Individual	Harry	Page			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	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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 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						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	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 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1171-0002	Individual	Harry	Page			Hou5		The plan has included Thorney Bay development for 173 homes, so									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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								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.											
1171-0003	Individual	Harry	Page			C4					The number of Canvey West homes puts residents in the East at risk with emergency						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

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											evacuation procedures.						living at East Canvey		
1172-0001	Individual	Sylvia	Page			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	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 predetermined towards a "no Greenbelt build 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	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led						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	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 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.	
1172-0002	Individual	Sylvia	Page			Hou5		The plan has included Thorney Bay developme									Policy HOU5 should make provision for improved site environment for	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								nt 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.									the local residents		
1172-0003	Individual	Sylvia	Page			C4					The number of Canvey West homes puts residents in the East at						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

ID Ref	Individual/Organisation/Agent ?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. 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
											risk with emergency evacuation procedures.						those residents living at East Canvey		
0777-0001	Individual	Brian	Palmer		Yes	SP3	No	The North West Thundersley or known as (The Blinking Owl Site) has not been considered and this answers the problems of. >>>>> More gridlocked traffic on the local roads and would be giving better access to major roadways . A127 >A130 (Essex County Council are already committed to improving Essex Roads .) Therefore would consider the necessary	No	Positively prepared	North West Thundersley (The Blinking Owl Site.) has not been considered which would resolve most of the problems the existing Plan Draft at the moment .	Using the North West Thundersley ie The Blinking Owl Site resolves a lot of the existing problems. Also help with problems with the existing Road Network for the future.	No	Not Answered	Not Answered		North West Thundersley Transport	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. 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	N

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								road improvements within the budget they have been allowed. Canvey Island ? with only one road access already is gridlocked most of the day. Canvey Island already has the threat of flooding >> More Houses ?										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.	
0777-0002	Individual	Brian	Palmer		Yes	HAD2	No	Unsound at Reg2	No	Positively prepared	The vision For Hadleigh Farm area,policyHad2. Would cause more road gridlock in the area. And existing roadworks are already unable to repair our broken roads and pavements. The NHS local Health Service cannot cope already with	Consider the alternative North West Thundersley ie The Blinking Owl. With The option of moving Manor Trading Estate to that area. At present The roads and pavements on this site full of broken surface areas with deep pot holes . This large area providing alternative houses with exit road routes to A127 and A130	No	Not Answered			Objecting to proposals at HAD2 which would cause more pressure to roads and NHS services North West Thundersley	Policy HAD2 does not include any housing development proposals and encourages the use of the area for recreational/agricultural purposes. 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	N

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											existing locals needs.							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.	
0520-0001	Individual	Dorothy	Panter		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	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 increases in housing delivery to be set out and agreed in plans,	N

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											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 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								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 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	

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											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 Canvey's residents are of the same opinion.							Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the 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 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. 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	

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																		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 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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0520-0002	Individual	Dorothy	Panther		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 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	N	

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																		Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0520-0003	Individual	Dorothy	Panter		Yes	Foreword					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					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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											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.								
1311-0001	Individual	Dorothy	Panter			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		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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											which improves the overall site environment for the local residents.								
1311-0002	Individual	Dorothy	Panter			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	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 should 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 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	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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											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.							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. 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	

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																		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 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	

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																		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 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.	
1311-0003	Individual	Dorothy	Panter			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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0402-0001	Individual	Janet	Parish		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	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 "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	<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 – 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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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.						directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's 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 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	

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																		have been considered through the SFRA.	
0402-0002	Individual	Janet	Parish		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
1083-0001	Individual	Derek	Parker		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1444-0001	Individual	Barbara	Parker			SP3	Not Stated	To whom it may concern, As a resident for 50 years in this area, I strongly	Not Stated								To whom it may concern, As a resident for 50 years in this area, I strongly object to the underhand methods by the	Noted	N

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								object to the underhand methods by the current Labour Government changing designated 'Green Belt' to so called 'Grey Belt' areas. It is all part of the plan to weaken local views by putting parts of Essex together and delaying local elections. The Government expect the people of Essex to comply to their agenda and increase the population of this county against the wishes of it's residents. Our MP Rebecca									current Labour Government changing designated 'Green Belt' to so called 'Grey Belt' areas. It is all part of the plan to weaken local views by putting parts of Essex together and delaying local elections. The Government expect the people of Essex to comply to their agenda and increase the population of this county against the wishes of it's residents. Our MP Rebecca Harris is fighting this cause and I fully support her. If British citizens are having 1.41 children, additional housing is not necessary. It is a con and part of an irreversible plan if it is allowed to go ahead. It would change the county irreparably.		

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								Harris is fighting this cause and I fully support her. If British citizens are having 1.41 children, additional housing is not necessary. It is a con and part of an irreversible plan if it is allowed to go ahead. It would change the county irreparably.											
0731-0001	Individual	Janette	Parker-East		Yes	Whole Plan	Yes		Yes	Positively prepared, Effective, Justified, Consistent with national policy			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N
0852-0001	Individual	Pankaj	Patel		Yes	HAD4	No	The residents views especially on Scrub Lane should have been collected. No indication of impact on local services eg schools doctors dentist etc.	No	Positively prepared, Justified	The areas objective needs infact will be made worse by the increase in traffic problems. SCRUB LANE has been used as an alternative route at peak times when A13 London Road can't cope with	To make sound take a look at views of surrounding local residents and include them on your proposal under justified.	Yes	Not Answered	Not Answered	A	Objects to HAD4 due to traffic on scrub lane and infrastructure	Traffic Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Infrastructure Infrastructure matters	N

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											traffic. The Humps were introduced on Scrub Lane to slow down and reduce traffic. It worked in the beginning but increase in traffic generally has brought back the problem. The part of the road next to the land is used by parents dropping and picking up children from the Local school. You should investigate this further before proposing that the new residents will be using Scrub Lane to get to their houses. Please look at the problem between Bilton and Seymour Road after only around 14 houses were built in the Mews! Building 114 house will							(including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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											mean almost over 200 cars/vans and where will these park, on Scrub Lane. Where will parents park for the SCHOOL Drops and pickups?								
0856-0001	Individual	Nootan	Patel		Yes	HAD4	No	Not enough space for traffic flow on the roads, schools, health care, etc	No	Positively prepared, Justified	There is strain on Scrub Lane at the present with traffic. Not enough space for extra schools, health care, etc. No space for stationary cars on the road plus too near environmentally to the Nature Reserve.		No	Not Answered	Not Answered		Objects to HAD4 because: Traffic Parking Infrastructure Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.	N

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0243-0001	Individual	Jan	Payne		Not Stated	SP3	Not Stated	Firstly, we would like to thank you for protecting our green belt and for listening and responding to the concerns and suggestions raised by the residents in the previous consultation. However, we would like to point out that we, along with many others, have found your on-line process for this consultation to be far too longwinded and very complex. You are asking for the general public to sit down and read hours'	No	Not Stated			Not Stated		No	B - see 0243 - 0002 to 0003	Support the protection of the green belt. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? Canvey: Concerns with access and congestion. Policy Thun2: Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities- Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If	Existing Commitments: Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). However, it is agreed that the plan could have been clearer on this point and a modification is proposed to signpost this reference in the supporting text. Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Thun2 allows for the existing facilities to be incorporated within an on-site redevelopment, so an offsite location may not necessarily be required.	Y -Para 6.42 In addition to this planned supply, consideration has been given to supply already in the pipeline. These are sites that have already been granted planning permission, known as existing commitments. This pipeline of supply forms the starting point for the housing growth that will happen over the Plan period. As of 1st April 2025, development totalling 480 new homes had the benefit of planning permission. The housing trajectory which supports the Castle Point Plan is set out at Appendix 2 of the

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								worth of documentation, (which is very hard to do if you only have access to only a mobile phone) and to fully understand all the implications and 'generic' statements. So, we hope that you'll accept our views as to why we believe certain policies are not SOUND, (we are not qualified to say whether your plans are legal or not) which we have opted to email, as your feedback form is too complicated and off-putting. We also suggest									they are to be reallocated, you have made no consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this	Parking provision covered under Policy T7. Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	Housing Topic paper (August 2025)

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								that you read the Facebook page for Essex Planning where many others have expressed their views. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? With regards to Canvey Island: We understand that you are trying									space without it feeling very cramped and overpopulated. Parking: Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any		

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								to seek a third access road, but until you have concrete plans in place for this, how you can entertain building what appears to be the lion's share of the housing allocation for Castle Point on the Island? You will see comments on Facebook about how difficult it is to build on Canvey due to the nature of the marshland and composition of the soil. We are also aware of how congested these roads									two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. No 5 year supply.		

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								become in peak hours and that's before any accidents which grid locks the whole area including the High Road in South Benfleet. Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities-Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be reallocated , you have made no											

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								consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing											

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								council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and overpopulated. Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not											

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								enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would											

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								make any two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. You must remember that whatever you promise in the 'plan' regarding building targets, the											

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								government will expect you to adhere too. It can't be based on speculation or 'what if's.' And as pointed out by Rebecca Harris, you have not specified an allocation that will be built within the next five years and neither have you put across a stronger enough case within the plan for falling short of the government's housing target for our Borough.											
0243-0002	Individual	Jan	Payne		Not Stated	SP4	Not Stated		Not Stated	Not Stated	Firstly, all the infrastructure must be in place and a guarantee from the developers that all promised additions ie, GP surgeries, improved junctions,		Not Stated		No	None	linfrastructure must be in place and a guarantee from the developers that all promised additions ie, GP surgeries, nurseries, improved junctions,	Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											nurseries, improved junctions, affordable houses and assisted living for the elderly are delivered and not postponed at the last moment or take years to implement after the main development had been built. Secondly, Southend Hospital cannot cope at the moment. [REDACTED] How will they cope when all these extra people are living in Castle Point? You must						affordable houses and assisted living for the elderly are delivered and not postponed at the last moment or take years to implement after the main development had been built. Southend Hospital cannot cope at the moment.		

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											take into consideration the huge influx of residents that Southend B.C are expecting too. What are your intentions for dealing with the issue so that the hospital can cope and provide a safe environment that isn't detrimental to patients' health and wellbeing?								
0243-0003	Individual	Jan	Payne		Not Stated	T1	Not Stated		Not Stated	Not Stated	I still cannot understand how you expect everyone residing in one of these new properties to use the bus, walk or cycle and follow the 'formula' for allocated vehicle and cycle parking (including businesses), how this will realistically work? I certainly wouldn't want to cycle on our roads and		Not Stated		No	None	Unrealistic expectation on limiting car use and peoples' willingness to walk, cycle or take public transport. Concern over congestion.	Noted Highways Impacts The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	N

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											not everyone is a ten-minute walk from a bus stop. In an ideal and perfect world, it would be wonderful if we restricted car use, but it is not realistic. If it was that easy, we'd all be doing it now. I can only see the roads become more gridlocked at peak times, with higher pollution levels for the residents, especially with the new AI building approved in Basildon. Finally, how will the amalgamation of the councils affect all this? And has anyone from the government actually visited this area during a rush hour and experienced the A127,								

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											A130 and A13. The road improvements at Fairglen Interchange will only move the queues further up these roads.								
0244-0001	Individual	Keith	Payne		Not Stated	SP3	Not Stated	Firstly, we would like to thank you for protecting our green belt and for listening and responding to the concerns and suggestions raised by the residents in the previous consultation. However, we would like to point out that we, along with many others, have found your on-line process for this consultation to be far too longwinded.	No	Not Stated			Not Stated		No	B - see 0244 - 0002	Support the protection of the green belt. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? Canvey: Concerns with access and congestion. Policy Thun2: Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing	Existing Commitments: Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). However, it is agreed that the plan could have been clearer on this point and a modification is proposed to signpost this reference in the supporting text. Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan.	Y -Para 6.42 In addition to this planned supply, consideration has been given to supply already in the pipeline. These are sites that have already been granted planning permission, known as existing commitments. This pipeline of supply forms the starting point for the housing growth that will happen over the Plan period. As of 1st April 2025, development totalling 480 new homes had the benefit of planning permission.

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								d and very complex. You are asking for the general public to sit down and read hours' worth of documentation, (which is very hard to do if you only have access to only a mobile phone) and to fully understand all the implications and 'generic' statements . So, we hope that you'll accept our views as to why we believe certain policies are not SOUND, (we are not qualified to say whether your plans are legal or not) which we have opted to								facilities- Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be reallocated, you have made no consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation . What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with	Thun2 allows for the existing facilities to be incorporated within an on-site redevelopment, so an offsite location may not necessarily be required. Parking provision covered under Policy T7 . Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	he housing trajectory which supports the Castle Point Plan is set out at Appendix 2 of the Housing Topic paper (August 2025)	

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								email, as your feedback form is too complicated and off-putting. We also suggest that you read the Facebook page for Essex Planning where many others have expressed their views. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening									the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and overpopulated. Parking: Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe		

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								in this Borough? With regards to Canvey Island: We understand that you are trying to seek a third access road, but until you have concrete plans in place for this, how you can entertain building what appears to be the lion's share of the housing allocation for Castle Point on the Island? You will see comments on Facebook about how difficult it is to build on Canvey due to the nature of the marshland and									on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. No 5 year supply.		

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								composition of the soil. We are also aware of how congested these roads become in peak hours and that's before any accidents which grid locks the whole area including the High Road in South Benfleet. Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities-Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to											

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								remain or be positioned elsewhere? If they are to be reallocated , you have made no consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership ? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to											

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								consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and overpopulated. Another concern with these larger developments is the lack of provision for parking and the assumption that											

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								everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe on our busy roads? Prices of bus journeys will need to											

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								be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. You must											

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								remember that whatever you promise in the 'plan' regarding building targets, the government will expect you to adhere too. It can't be based on speculation or 'what if's.' And as pointed out by Rebecca Harris, you have not specified an allocation that will be built within the next five years and neither have you put across a stronger enough case within the plan for falling short of the government's housing target for our Borough.											

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0244-0002	Individual	Keith	Payne		Not Stated	SP4	Not Stated		Not Stated	Not Stated	All infrastructure must be put in place as building progresses.		Not Stated		No	None	All infrastructure must be put in place as building progresses.	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
0919-0001	Individual	Michael	Payne		Yes	HAD4	Yes		No	Justified	I do not believe that 100+ new homes sighted next to a primary school would be reasonable. A better use for the land would be an extension of the school grounds with additional buildings to the school to accommodate more places for children to attend. It could encompass a special educational needs provision for children in the area which hadleigh currently lacks.		No	Not Answered	Not Answered		Objecting to HAD4 Location next to primary school would be better used for school extension	Comments noted.	N

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1235-0001	Individual	Christine	Payne			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	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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 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						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	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 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1235-0002	Individual	Christine	Payne			Hou5		The plan has included Thorney Bay development for 173 homes, so									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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								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.											
1235-0003	Individual	Christine	Payne			C4					The number of Canvey West homes puts residents in the East at risk with emergency						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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											evacuation procedures.						living at East Canvey		
0067-0001	Individual	Maurleen	Pearce		Not Stated	SP3	No	I agree with Dame Rebecca Harris's reply to you I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. . The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Note,	No	Consistent with National Policy	It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines.	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	No		Yes, Dama Rebecca Harris' consultation response		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Grey belt 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	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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								I do not wish to participate at the oral submission.									can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.		
0920-0001	Individual	Juliette	Pearce		Yes	SP3	No	While the Plan has been through consultation, I do not consider it fully legally compliant because: - It has not demonstrated a clear five-year housing land supply, which is required under the NPPF. - The Duty to Cooperate with neighbouring authorities and statutory bodies has not been evidenced by Statements of Common Ground. - The	No	Consistent with national policy	The Plan does not meet the tests of soundness because it: - Places disproportionate housing allocations on Canvey Island, despite flood risk, limited access routes, and drainage concerns. Also does not adequately address Hadleigh infrastructure issues from existing overdevelopment. Including road congestion and overstretched drainage systems. - Excludes North West Thundersley (Blinking Owl) without sufficient	To make the Plan legally compliant and sound, I suggest: - Including North West Thundersley (Blinking Owl) as a strategic housing growth site. It is already part-brownfield/grey belt, has strong transport links, and could relieve pressure on more sensitive Green Belt, and on Canvey Island. - Reducing the overall allocation for Canvey Island, to reflect its unique flood and drainage risks, and reconsidering any sites where standard SUDS drainage systems would not function. - Strengthening the evidence base on housing supply so that a deliverable five-year supply can be demonstrated, giving real protection to	No	Not Answered	Not Answered		Flood risk on Canvey No five year housing land supply No duty to cooperate	Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Five Year Housing Land Supply The Council is currently relying on	N

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								Sustainability Appraisal has not properly assessed North West Thundersley (Blinking Owl) as a reasonable alternative, despite its potential to meet housing needs in a more sustainable location.			evidence, even though it offers lower flood risk, better road access, and potential to deliver housing numbers more sustainably. • Fails to provide a justified or deliverable housing strategy over the plan period, leaving other valuable Green Belt land vulnerable to speculative applications. • Does not align with national policy requiring robust evidence of alternatives and a deliverable five-year supply.	valued Green Belt sites. Including Hadleigh farmland/Castle. • Improving cross-boundary cooperation with Essex County Council and neighbouring boroughs, particularly in relation to road infrastructure and drainage.						the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to 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	

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																		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.	
0086-0001	Individual	Lacey	Peck		Not Stated	Had2	No	I wish to raise a serious concern regarding the Castle Point Local Plan Had2 (Regulation 19) consultation.	No	Not Stated	The process for submitting objections is unnecessarily complex, with requirements for specific policy references, page numbers, table references, and map numbers that are extremely difficult for ordinary residents to identify without specialist		Not Stated		No		I wish to raise a serious concern regarding the Castle Point Local Plan Had2 (Regulation 19) consultation. The process for submitting objections is unnecessarily complex, with requirements for specific policy references, page numbers, table references, and map numbers that are	Comments noted and placed on record	N

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											planning knowledge. This creates a serious barrier to democratic participation and effectively silences opposition by making it almost impossible for residents to respond meaningfully. I believe this approach is deliberate, designed to reduce the number of objections recorded. This is unacceptable and undermines public trust in both the Council and the planning system as a whole. I therefore ask that this concern is formally acknowledged, recorded, and raised with the Planning Inspectorate. The consultation						extremely difficult for ordinary residents to identify without specialist planning knowledge. This creates a serious barrier to democratic participation and effectively silences opposition by making it almost impossible for residents to respond meaningfully. I believe this approach is deliberate, designed to reduce the number of objections recorded. This is unacceptable and undermines public trust in both the Council and the planning system as a whole. I therefore ask that this concern is formally acknowledged, recorded, and raised with the Planning Inspectorate. The		

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											process should be accessible, fair, and transparent to all residents — not just those with professional planning expertise.						consultation process should be accessible, fair, and transparent to all residents — not just those with professional planning expertise.		
0678-0001	Individual	Eileen	Peck		Yes	HOU3	Yes		No	Effective	My concern is about housing: It's good that the local plan acknowledges the need for housing for the elderly but I don't think it goes far enough. The fact that CP has an ageing population contributes to housing shortage. Over 8,000 people in CP claim single occupancy discount on council tax, many of whom - including me - would downsize if something suitable was available in their neighbourhood	See 3c above	Yes	Not Answered	Not Answered		Lack of provision of housing for the elderly	Policy HOU4 makes provision for specialist housing, including the elderly, which has been based on the need identified in the Local Housing Needs Assessment 2023 and the Local Housing Needs Assessment Update 2025.	N

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											d. Not sheltered accommodation or a flat with no garden. Many live in large houses which could be converted into two, or sometimes three, independent living spaces. This would release family houses for families. I suggest the Council could: (1) Put out an invitation to those older people in family houses to see how many would like to look at the feasibility of converting their house (2) Seek architects who would appraise the properties as to their suitability.								

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0286-0001	Individual	Brian	Percy		Yes	SP3	No	Dear Sir/Madam I do not support the castle point plan regulation 19 draft consultation. I do not consider the draft plan to be legally compliant. Reason : It fails to consider strategic alternatives like North West Thundersley. It has no credible 5 year housing land supply.	No	Justified, consistent with national policy	I do Not consider the draft plan to be sound Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for castle point. The site selection ignores green belt / grey belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a “no green belt build policy”. The site selection is based on the “over development of brown field sites”. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the	Proposed Modification: Add North west thunderously site.	Not Stated		No		Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt,	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). 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 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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											exclusion on 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 Islands unique geography and drainage infrastructure . The 3316+ urban homes for Canvey is not resident led.						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.	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.	
0286-0002	Individual	Brian	Percy		Yes	C4	No	Canvey west homes puts residents in the east at risk with emergency evacuations procedures .	No	Not Stated			Not Stated		No		The 3316+ urban homes for Canvey is not resident led. Canvey west homes puts residents in the east at risk with emergency evacuations procedures.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0407-0001	Individual	Deirdre	Perry		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	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 "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	<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 – 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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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.						directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's 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 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	

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																		have been considered through the SFRA.	
0407-0002	Not Answered	Deirdre	Perry		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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0929-0001	Individual	Neil	Perry		Yes	SP3	Yes		No	Positively prepared, Effective, Justified	I do not believe the current plan is sound and acceptable for the following reasons: 1. The Council has not yet demonstrated a deliverable five-year housing land supply in its current format which is a fundamental test of the the plans credibility. 2. In order to do this it has to pass 4 tests of soundness which are that it is positively prepared, justified, effective and consistent with the National policy - I believe the current plan does not meet these essential criteria fully. I appreciate they have	Please refer to my previous answer above In summary the current plan requires revision to meet the soundness tests, the number of homes on Canvey should be reconsidered, the shortfall addressed by improving the brownfield strategy and including North West Thundersley to improve the plan significantly and thereby reducing the gap to housing target in the process. Essex Council would be legally obliged to co-operate through its infrastructure investment to take advantage of North West Thundersley as a key strategic opportunity for sustainable growth.	No	Not Answered	Not Answered	A	No five year housing land supply Exclusion of North West Thundersley Canvey Flooding Third road onto canvey	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It 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	N

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											endeavoured to protect the Green belt sites which are a much loved and beautiful feature of the area but in doing that I do not believe they have considered an option which is worth considering. 3. The overall housing target for Castle Point that has been imposed centrally is simply impossible to meet without permanently damaging the character and beauty of the area which is appreciated and hugely enjoyed by the communities in the area and causing serious failure of the local infrastructure which all of us rely on a daily basis but is already							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 CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is	

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											struggling to cope. 4. The current proposed plan is set to deliver only around 50% of the Governments housing target a shortfall of over 5,000 homes over the plans timeline. The current plan does not justify this shortfall whilst I have said above that it is clear that although the environmental constraints and infrastructure issues are included, in order to justify the inability to meet the full target the council does need to provide sufficient evidence that these are clearly demonstrated and that it has considered							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. 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	

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											every viable alternative in order for the plan to be "sound". The exclusion of North West Thundersley in the current plan undermines the credibility of the plan. 5. The sustainability appraisal within the plan does not assess North West Thundersley site in sufficient depth or with the rigour that has been applied to the other locations - this in itself renders the current plan unsound and in turn the five year housing land supply is not sufficiently demonstrated with the reliance on constrained sites casting serious doubt on deliverability of the plan							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 transport improvement projects identified in the Local Transport Plan.	

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											6. The NPPF is clear through paragraphs 159 and 161 that any development should be away from areas at the highest risk for flooding - this has most impact on the Canvey Island proposal in the plan which although it has current effective mitigation in this regard any future adjustments required to the sustainable urban drainage systems are of a unique nature so as not to upset the balance of the existing drainage network and any on site drainage systems unable to mechanically discharge or be connected into a properly								

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											managed system pose an unacceptable risk - Canvey has a unique geography and the plan does not reflect this in reality or show how the risk of new flooding or contamination of the groundwater would be mitigated. 7. The current plan places too much housing demand on Canvey Island despite its history, unique geography and serious infrastructure limits so building 3,300 homes there is excessive and not justified in the current plan. Canvey also only two access points which is a serious which is strategically a serious weakness									

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											8. The exclusion of North West Thundersley is difficult to understand - it has far better transport connectivity, much lower flood risk and is supported strongly in the local areas - this site is mainly plotlands and industrial units and any development there would impact far fewer residents - excluding it is not justified well enough in the current plan and the Sustainability Appraisal fails to assess it as a reasonable, viable alternative. 9. In my opinion I believe that the housing number for Canvey should be reduced and also be contingent									

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											upon clear robust measures against flooding, including a unique and comprehensive drainage plan together with exploring the need for a third access route to alleviate the gridlock situation that currently exists on and off the island - North West Thundersley offer a better alternative with better connections, a lesser flood risk and the potential for a much better infrastructure . The site (including the area known as the Blinking Owl) has previously been recognised in earlier studies as being capable of providing space for up to and in excess of								

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											5,000 homes. The combination of the two measures (Canvey Reduction and use of North Thundersley) would provide for a greater number of houses and reduce the short fall of the current plan to a more acceptable level and much closer to the Government Assessed need. 10. Claims that the North Thundersley site is not viable due to policy restrictions by the local Highways Authority are not justified in the plan and do not pass scrutiny - the current investment in the Fairglen Interchange of £59 million includes new slip roads,								

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											signal junctions and pedestrian and cycling infrastructure are designed to help accommodate future housing and economic growth for South Essex. There is an acknowledgment in Essex Councils infrastructure planning documents that the A127/A130 transport corridor will come under further pressure and that long term options to expand it remain viable. 11. Although part of the North Thundersley site are designated as Green Belt; including it can be justified under paragraph 143 of the NPPF which says that								

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											Green Belt release is allowed where exceptional circumstances can be demonstrated clearly - in this case Castle Point has a severe housing shortfall, and North West Thundersley offers an area where growth can be delivered in a safe way, sustainably and with less environmental impact and will affect fewer residents as it is mainly "grey belt" inaccessible land, industrial units and plotlands. This fits the terms of strategic release of green belt by protecting more sensitive areas and placing growth where it can								

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											supported properly 12. To conclude the current plan requires revision to meet the soundness tests, the number of homes on Canvey should be reconsidered, the shortfall addressed by improving the brownfield strategy and including North West Thundersley to improve the plan significantly and thereby reducing the gap to housing target in the process. Essex Council would be legally obliged to co-operate through its infrastructure investment to take advantage of North West Thundersley as a key strategic opportunity								

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											for sustainable growth.								

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0930-0001	Individual	Cheryl	Perry		Yes	SP3	Yes		No	Effective, Justified, Consistent with national policy	My concerns regarding the soundness of the plan I wish to record my concerns regarding the soundness to the current version of the Castle Point Local Plan. While I acknowledge the Council's efforts in formulating a development strategy that preserves the green belt land, I do not believe the draft plan is sound. There are several critical weaknesses, particularly in terms of housing delivery, site selection, infrastructure capacity, and the inclusion of viable alternatives. I've summarised my concerns below: 1. Lack of a	See my comments above	No	Not Answered	Not Answered	A	No five year housing land supply Exclusion of North West Thundersley Infrastructure Not meeting housing targets without justification	No five year housing land supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It 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	N

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											Demonstrable Five-Year Housing Land Supply A key requirement of national planning policy is that local authorities must demonstrate a deliverable five-year housing land supply. The current plan has a number of omissions and falls far short of the Governments housing target requirement achieving only 53% of the requirement. Whilst I believe the Government target is not wholly achievable the plan needs to demonstrate that all alternatives have been properly considered and there are omissions in the current							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 CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Infrastructure Infrastructure matters (including healthcare	

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											plan. 2. Insufficient Consideration of Alternatives Undermines the Plan's Soundness The Local Plan must satisfy four key tests: it must be positively prepared, justified, effective, and consistent with national policy. Although the Council has sought to protect the Green Belt—a valued asset in the borough—it has failed to properly consider other reasonable and sustainable alternatives. The exclusion of North West Thundersley, despite its development potential and relatively low environmental sensitivity, undermines								and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in 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	

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											the plan’s justification and raises questions about whether the strategy has been robustly tested. 3. Overambitious Targets with Negative Local Impact The centrally imposed housing requirement for Castle Point is extremely difficult to meet without placing an unacceptable burden on local infrastructure and causing long-term harm to the character of the borough. The plan proposes growth in areas that are already stretched in terms of services, traffic capacity, and environmental resilience. Without more								housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.	

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											balanced site selection, the plan risks doing more harm than good. 4. Inadequate Justification for Housing Shortfall The current draft only aims to deliver around 50% of the total housing need—leaving a shortfall a significant shortfall. While constraints such as flood risk and infrastructure limitations are acknowledged, the plan does not provide sufficient evidence that every reasonable alternative has been explored to reduce the gap. The exclusion of North West Thundersley is particularly									

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											concerning in this context, as its inclusion could significantly reduce the shortfall in a sustainable way. 5. Lack of Rigorous Assessment for North West Thundersley The Sustainability Appraisal fails to assess North West Thundersley with the same level of detail and objectivity applied to other sites. This inconsistency calls into question the transparency of the site selection process. Given the potential of the area to support development with lower environmental and infrastructure risks, its									

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											dismissal is not adequately justified and compromises the robustness of the overall plan. 6. Flood Risk Not Properly Addressed for Canvey Island National planning policy clearly advises against placing development in areas of high flood risk unless absolutely necessary and without proper mitigation. Canvey Island is uniquely vulnerable due to its geography and reliance on complex drainage systems. While the plan references existing mitigation, it does not demonstrate how future drainage								

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											needs would be managed or how risks to groundwater and flood safety would be contained as development expands with the proposed 3,300 houses. 7. Excessive Development Burden on Canvey Island Allocating 3,300 new homes to Canvey Island is disproportionate, given its limited road access, historical flood issues, and already overburdened infrastructure . The island has only two access points, creating a major vulnerability during peak traffic or emergencies. The scale of development proposed for Canvey is not									

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											matched by any convincing infrastructure upgrades in the plan and appears unjustified in the broader context of available alternatives. 8. Unjustified Exclusion of North West Thundersley North West Thundersley has strong potential to accommodate housing growth: it has better transport links, minimal flood risk, and is supported locally. The area includes a significant amount of low-value land such as industrial sites, plotlands and inaccessible land. Its exclusion from the plan lacks a sound explanation and ignores a viable, lower-										

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											impact alternative that could help meet housing needs more sustainably, significantly reduce the gap to target and with less disruption to existing communities. 9. Balanced Strategy Required: Reduce Canvey Allocation and include the North West Thundersley site. A more effective and balanced strategy would be to scale back the housing numbers allocated to Canvey Island, making any development there contingent on clear, enforceable flood mitigation plans and improved								

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											access. In parallel, North West Thundersley should be brought forward for housing allocation and added to the proposal, although classified as some green belt it meets the requirements for a justified green belt exception unlike other green belt sites in the locality. Previous studies have identified this area (also known as the Blinking Owl site) as being capable of delivering in excess of 5,000 homes. This would help address the housing shortfall while placing development where infrastructure and environmental risks are more								

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											manageable. 10. Transport Constraints Argument Not Substantiated Claims that North West Thundersley cannot be brought forward due to local highways policies do not withstand scrutiny. The planned £59 million upgrade of the Fairglen Interchange will introduce new capacity through additional slip roads, signal junctions, and pedestrian/cycle links. Essex County Council's own infrastructure documents acknowledge that the A127/A130 corridor will likely need to be expanded to support future growth. The assertion that the area									

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											is not viable due to Highways Authority restrictions is therefore incorrect and not a viable reason to exclude the North West Thundersley site. 11. Green Belt Release Justified by Exceptional Circumstances While part of North West Thundersley lies within the Green Belt, national policy (paragraph 143 of the NPPF) allows for Green Belt release in cases of exceptional need. Castle Point's acute housing shortfall and lack of available unconstrained land qualify as such circumstances. Much of the land in question is of									

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											low environmental value—largely made up of plotlands, inaccessible land and industrial uses (grey belt) —and its development would be far less intrusive than building in the other green belt areas. 12. Conclusion and Recommended Changes In its current form, the Local Plan does not meet the tests of soundness and should be revised. Key changes required include: A reduction in the scale of development proposed for Canvey Island, contingent upon stronger flood									

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											protections and access improvements. The inclusion of North West Thundersley as a strategic housing site. A more transparent and evidence-based justification for site selection and housing distribution. A strategy that brings the plan closer to meeting the full housing requirement while aligning with sustainable development principles. Castle Point has a responsibility to deliver new homes, but this must be done in a way that protects residents, infrastructure , and the environment. A more									

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											balanced, evidence-led approach would significantly improve the soundness and deliverability of the plan.								

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0372-0001	Individual	William	Persey		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh	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 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	N

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											Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development,							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 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	

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											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 support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation								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 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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											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.							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 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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0053-0001	Individual	Christine	Peters		Yes	Whole Plan	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation. I consider the draft to be legally compliant. I consider the draft plan to be sound.	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N

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0336-0001	Organisation	Caroline	Peters	Essex Police		Vision	Not Stated	Essex Police acknowledges the Vision and objectives for Castle point and is encouraged that 'Safe home and street' has been included. It is essential that crime (and the perception of,) Anti-Social Behaviour (ASB) and safety is taken into consideration when creating new and existing communities, this will also support health and wellbeing and sustainable outcomes. Working alongside the DOCO will support the vision for Castle	Not Stated							A	Supports the vision	Support noted.	N

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								Point and support the creating safe and inclusive places for all.											
0336-0002	Organisation	Carol ine	Peters	Essex Police		SP2	Not Stated	Within Paragraph 3 it is stated that 'new development contribute(s) positively towards the quality of the Borough'. The DOCO notes the need to make effective use of Urban land and agrees development should contribute positively. It is advised there is liaison with Essex Police to ensure all new development is designed to be safe and secure which will	Not Stated		The DOCO notes paragraph 6.27 which advises the Council will work alongside Design Teams to ensure development is appropriately designed. We would strongly advocate that the DOCO is included in this process to ensure new development is being designed with the consideration s towards crime and anti-social behaviour (ASB). Furthermore, academia identifies that the impact (and perception of) crime can have a negative					A	advised there is liaison with Essex Police to ensure all new development is designed to be safe and secure which will support this policy and National Guidance.	Applications will have to comply with policy D1 which encourages design out crime	N

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								support this policy and National Guidance.			effect on the health and wellbeing of communities, which aligns to longer term sustainability goals.								
0336-0003	Organisation	Carol	Peters	Essex Police		SP3	Not Stated	The DOCO was invited to attend the Castle Point Regulation 19 Draft Plan Stakeholder Workshop and further to this meeting recommends that the DOCO is contacted (ideally at the pre-planning stage) regarding future Master Plans, this will enable effective partnership working and ensure all new development are safe for all future users.	Not Stated			To evidence requirements within National Policy aligned to safety and security, and to substantiate commitments within Design and Access Statements, Health and Wellbeing Strategies etc, it is recommended Secured by Design (SBD) accreditation is considered. Please note that the DOCO would welcome the inclusion of Planning Conditions to not only secure SBD accreditation but where appropriate condition DOCO / Essex Police Engagement.				A	Ensure alignment with national policy with regards to safety and security	Policy D1 requires opportunities for design out crime to be taken.	N

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0336-0004	Organisation	Caroline	Peters	Essex Police		C1	Not Stated	The DOCO acknowledges the proposed regeneration and investment into Canvey Island Town Centre. Traditional town centres are known to have a higher rate of crime and ASB due to the mixed uses (inclusive of Nighttime Economy) and volume of people. It is strongly advised that the DOCO is involved in future meetings to discuss the regeneration of the Town Centre; this will help with the reduction of crime	Not Stated							A	Mixed use buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Policy D1 requires opportunities for design out crime to be taken.	N

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								and ASB and having a positive effect on the community . Additionally, the DOCO can aid with the future refurbishments and enhancements proposed within the regeneration of the Knightswick Centre.											
0336-0005	Organisation	Caroline	Peters	Essex Police		C2	Not Stated	It is referenced there will be a Master Plan prepared by the Council which 'will set out a clear vision and objectives for the area'. When preparing the master plan, we would advocate that in addition to the	Not Stated							A	When preparing the master plan, we would advocate that in addition to the mitigation of crime and ASB, that developers incorporate measures to reduce the opportunities for 'Violence against Women and Young Girls' across their proposals. As part of the consultation process, engagement with the DOCO will ensure that the Sea Front area is safe and	This site will be assessed under policy D1 which includes opportunities for design out crime to be taken	N

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								mitigation of crime and ASB, that developers incorporate measures to reduce the opportunities for 'Violence against Women and Young Girls' across their proposals. As part of the consultation process, engagement with the DOCO will ensure that the Sea Front area is safe and inclusive all at all times (this will consider the Nighttime Economy).									inclusive all at all times (this will consider the Nighttime Economy).		
0336-0006	Organisation	Caroline	Peters	Essex Police		C3	Not Stated	It is noted that future development within the Port will be addressed under	Not Stated							A	It is noted that future development within the Port will be addressed under Permitted Development.	Within the parameters of the applications submitted where possible Essex police will be consulted.	N

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								Permitted Development. The DOCO acknowledges the parameters of such applications but would welcome consultation in relation to the design and layout, cognisant of sustainability requirements for the public access route and proposed local cycling and walking routes.									The DOCO acknowledges the parameters of such applications but would welcome consultation in relation to the design and layout, cognisant of sustainability requirements for the public access route and proposed local cycling and walking routes.		
0336-0007	Organisation	Carol	Peters	Essex Police		C4	Not Stated	The DOCO acknowledges the site will provide approximately '2,700 new homes, employment, associated community facilities and open space provision' and that	Not Stated							A	It is recommended that the DOCO is consulted during the preparation for the Master Plan.	This site will be assessed under policy D1 which includes opportunities for design out crime to be taken.	N

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								this development will be subject to a Master Plan, (specifically regarding the improvement to public realm). It is recommended that the DOCO is consulted during the preparation for the Master Plan.											
0336-0008	Organisation	Caroline	Peters	Essex Police		C5	Not Stated	The DOCO notes the requirement to improve access to, from and within Canvey Island. It is essential that emergency vehicles can gain rapid access to any incident occurring across Canvey Island and surrounding	Not Stated							A	It is essential that emergency vehicles can gain rapid access to any incident occurring across Canvey Island and surrounding neighbourhoods. It is recommended that there is liaison with the Essex Road Policing Team who can support the design process when considering future road infrastructure.	Any changes to access will be subject to consultation from Essex highways.	N

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								neighbourhoods. It is recommended that there is liaison with the Essex Road Policing Team who can support the design process when considering future road infrastructure.											
0336-0009	Organisation	Caroline	Peters	Essex Police		C8	Not Stated	It is advised there is engagement with the DOCO when designing residential Park Homes. Due to the locations of park homes and the structure of the buildings they can be difficult to secure, it is however advised they are designed to be a safe	Not Stated							A	It is advised there is engagement with the DOCO when designing residential Park Homes. At the appropriate time within the planning process, we would strongly advocate the use of Planning Condition to secure engagement with the DOCO in relation to the application of CPTED principles.	As stated at paragraph 8.66 often these sites have come forward under existing planning consents but where possible Essex police will be consulted	N

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								and secure as possible to prevent crime and antisocial behaviour. At the appropriate time within the planning process, we would strongly advocate the use of Planning Condition to secure engagement with the DOCO in relation to the application of CPTED principles.											
0336-0010	Organisation	Caroline	Peters	Essex Police		B1	Not Stated	The DOCO recognises the potential for the redevelopment of the Town Centres and notes there is a requirement for mixed used development. Mixed used buildings can be difficult to	Not Stated			The DOCO would like to bring to your attention, the Home Office strategy of reducing Violence Against Women and Girls' (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing				A	Mixed use buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Policy D1 requires opportunities for design out crime to be taken.	N

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								secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.				new and adapting public realm and green spaces (inclusive of walking, cycling and play areas,) that consideration should be given to environmental design so that women and girls feel included and comfortable using the spaces. "Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that's rape, assault, or harassment. They also feel uncomfortable, unwelcomed, and judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark". Safer Parks Improving access for women and girls: Safer Parks Executive Summary (greenflagaward.org)							

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0336-0011	Organisation	Caroline	Peters	Essex Police		B2	Not Stated	The DOCO recognises the potential for the redevelopment of the Town Centres and notes there is a requirement for mixed used development. Mixed used buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Not Stated			The DOCO would like to bring to your attention, the Home Office strategy of reducing Violence Against Women and Girls' (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing new and adapting public realm and green spaces (inclusive of walking, cycling and play areas,) that consideration should be given to environmental design so that women and girls feel included and comfortable using the spaces. "Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that's rape, assault, or harassment. They also feel uncomfortable, unwelcomed, and				A	Mixed use buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Policy D1 requires opportunities for design out crime to be taken.	N

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												judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark". Safer Parks Improving access for women and girls: Safer Parks Executive Summary (greenflagaward.org)							
0336-0012	Organisation	Carol	Peters	Essex Police		B3	Not Stated	The DOCO recognises the potential for the redevelopment of the Town Centres and notes there is a requirement for mixed used development. Mixed used buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised				The DOCO would like to bring to your attention, the Home Office strategy of reducing Violence Against Women and Girls' (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing new and adapting public realm and green spaces (inclusive of walking, cycling and play areas,) that consideration should be given to environmental design so that women and girls feel included and				A	Mixed use buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Policy D1 requires opportunities for design out crime to be taken.	N

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								there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.				comfortable using the spaces. “Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that’s rape, assault, or harassment. They also feel uncomfortable, unwelcomed, and judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark”. Safer Parks Improving access for women and girls: Safer Parks Executive Summary (greenflagaward.org)							
0336-0013	Organisation	Carol	Peters	Essex Police		B8	Not Stated	The DOCO notes the redevelopment of the Manor Trading Estate, and the requirement to optimise urban land use and improve the quality of the urban								A	Welcome the opportunity to influence the design of Urban Land. Engagement will help identify features within the built environment that be designed out and assist in the creation of further planning objectives on this matter.	Consultation with the police alongside compliance with policy D1 will be implemented.	N

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								environment and public realm. Thought should be given to the current location and other parcels of Urban Land to identify what measures could be required from a safety and security perspective. Further to the Regulation 19 Draft Plan Stakeholder Workshop, we would welcome the opportunity to influence the design of Urban Land. Such engagement will help identify features within the built environment that be											

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								designed out and assist in the creation of further planning objectives on this matter.											
0336-0014	Organisation	Caroline	Peters	Essex Police		B9	Not Stated	It is recognised that the playing fields have been identified on the Master Plan as multi-functional green. It is essential all green space is designed to be safe and inclusive for all to use and enjoy. It is advised community facilities are designed to be safe and inclusive, this will support in the prevention of crime and ASB,				The DOCO would also like to draw your attention to the 'Make Space For Girls' campaign, (www.makespaceforgirls.co.uk/about-us); this initiative aims to incorporate the observations and opinions of teenage girls into the design and development of new and old play spaces. This is to ensure that spaces are inclusive and safe for female users. "We are working on a range of projects which improve parks and other outdoor spaces in order to support opportunities for teenage girls and improve their mental and physical well-being and their access to public space. We				A	It is advised community facilities are designed to be safe and inclusive, this will support in the prevention of crime and ASB, while allowing all users to feel included within the proposed facilities	This site will be assessed under policy D1 which includes opportunities for design out crime to be taken	N

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								while allowing all users to feel included within the proposed facilities				collaborate with a wide range of institutions, including universities, health trusts, councils, and developers to create change.”							
0336-0015	Organisation	Carol ine	Peters	Essex Police		Infra3	Not State d	Constructing well designed developments, buildings and places that promote both sustainable communities and health and wellbeing is an objective that Essex Police widely supports. Mitigating the opportunities for crime is not only about reducing and preventing injury and crime, but it is also about building strong, healthy,								A	Support for INFRA3.	Support noted	N

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								cohesive, accessible, vibrant, and participatory communities. 'The relationship between an area's health and crime levels is complex. On one hand, living in areas with high levels of crime can affect people's health negatively. In addition to the direct health effects of being the victim of violent crime, fear of crime can also have an indirect detrimental impact on health. Research shows that fear of crime results in											

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								people exercising less, as well as reducing how often people socialise, resulting in poorer mental and physical health.'											
0336-0016	Organisation	Carol	Peters	Essex Police		T1	Not Stated	It is advised that there is engagement with Essex Police Roads Policing Team when designing transport network improvements. It is essential that emergency vehicles can gain rapid access to any incident occurring within the community and surrounding neighbourhoods.								A	It is advised that there is engagement with Essex Police Roads Policing Team when designing transport network improvements. It is essential that emergency vehicles can gain rapid access to any incident occurring within the community and surrounding neighbourhoods.	Essex highways are a statutory consultee and will be consulted in receipt of any application submitted	N

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0336-0017	Organisation	Caroline	Peters	Essex Police		T2	Not Stated	It is advised that there is engagement with Essex Police Roads Policing Team when designing transport network improvements. It is essential that emergency vehicles can gain rapid access to any incident occurring within the community and surrounding neighbourhoods.								A	It is advised that there is engagement with Essex Police Roads Policing Team when designing transport network improvements. It is essential that emergency vehicles can gain rapid access to any incident occurring within the community and surrounding neighbourhoods.	Essex highways are a statutory consultee and will be consulted in receipt of any application submitted	N

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0377-0001	Individual	Gabriele	Peters		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh	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 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	N

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											Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development,							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 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	

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											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 support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation								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 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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											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.							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 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. 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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0548-0001	Individual	Susan	Phelps		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0548-0002	Individual	Susan	Phelps		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					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	N

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											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.							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. 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.	

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0548-0003	Individual	Susan	Phelps		Yes	Fore word					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 on this matter has been published and the					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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											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.								

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0582-0001	Individual	Sidney	Phelps		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0582-0002	Individual	Sidney	Phelps		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					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	N

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											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.							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. 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.	

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0582-0003	Individual	Sidney	Phelps		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
0325-0001	Individual	Ami	Philips			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and	PROPOSED MODIFICATION: Add North West Thundersley site.					Not all sites considered, such as North West Thundersley. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The	Grey belt covered under policy GB2. SLAA and SA considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. 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 infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								land supply.			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.						selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. Development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in	including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Assessment (SFRA).

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																	the East at risk with emergency evacuation procedures.		
03 25 - 00 02	Individual	Ami	Philips			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 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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0503-0001	Individual	Linda	Phillips		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0503-0002	Individual	Linda	Phillips		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					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	N

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											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.							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. 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.	

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0503-0003	Individual	Linda	Phillips		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
0122-0001	Individual	Kathy	Phipps		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing	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	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	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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								land supply.			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.						highest risk of flooding. Sustainable Drainage 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).

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0122-0002	Individual	Kathy	Phipps		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0940-0001	Individual	Callum	Pickrell		Yes	HAD4	Yes		No			The proposed site-Had4 - Land South of Scrub Lane for 114 new homes is not practical. Throughout the week during the school run all you have to do is go down scrub lane and you'll see how busy it is already, adding 114 houses to that plot of land with an average of 2 cars per family is over 200 additional cars on the road. The foundations are simply not setup to support this, not to mention the impact it will have on all the local amenities. The trees down scrub lane which make it a pleasant road to walk down would all be cut down and replaced with ugly new build houses.	No	Not Answered	Not Answered		Objects to HAD4 because: increased number of cars Infrastructure Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	Increased number of cars Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.	N

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0365-0001	Individual	Robert	Pigney		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support noted.	N
0366-0001	Individual	Debbie	Pigney		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support noted.	N
0222-0001	Individual	Jonathan	Pinnock		Not Stated	SP3	Yes	Dear Sir/Madam , I have completed the online response and the id is in the title of this email. Since, there was only opportunity to respond to 20 individual policies, I would like to add that I am happy that the Castle Point Plan is overall “Sound” and has been legally prepared. I am grateful that the public have had plenty of	Yes	Not Stated	Although my personal preference would be for no additional housing in Castle Point (due to already over-stretched infrastructure and resources), I understand the unacceptable pressure applied to CPBC by the National Government and I therefore accept the Plan as a reasonable compromise. I also recognise that certain individuals from the local Conservative party (who had previously failed to		Not Stated		Not Answered		I would like to add that I am happy that the Castle Point Plan is overall “Sound” and has been legally prepared. I am grateful that the public have had plenty of opportunity to respond at various stages and that very detailed evidence has been provided to support the policies in the Plan. It is a far more robust and reasonable Plan compared with any which I have reviewed in the past 20 years or so. Although my personal preference would be for no additional housing in Castle Point (due to already over-stretched	Comments noted	N

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								opportunity to respond at various stages and that very detailed evidence has been provided to support the policies in the Plan. It is a far more robust and reasonable Plan compared with any which I have reviewed in the past 20 years or so.			produce a Plan themselves before they were voted out of office), are actively trying to derail the Plan for their own purposes and have been spreading fear and misinformation amongst CPBC residents. I am concerned that their actions may directly result in far larger housing targets set by National Government than are in the current Plan, and may also result in the loss of Green Belt land which has been the concern uppermost in most residents minds over at least the past 20 years. I would respectfully ask that the						infrastructure and resources), I understand the unacceptable pressure applied to CPBC by the National Government and I therefore accept the Plan as a reasonable compromise. I also recognise that certain individuals from the local Conservative party (who had previously failed to produce a Plan themselves before they were voted out of office), are actively trying to derail the Plan for their own purposes and have been spreading fear and misinformation amongst CPBC residents. I am concerned that their actions may directly result in far larger housing targets set by National Government than are in the current Plan, and may also result in the loss of Green Belt		

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											Government Inspector takes note of these facts and concerns when reviewing the Plan. I would add that I am not, nor do I intend to be a member of any political party.						land which has been the concern uppermost in most residents minds over at least the past 20 years. I would respectfully ask that the Government Inspector takes note of these facts and concerns when reviewing the Plan. I would add that I am not, nor do I intend to be a member of any political party.		
0248-0001	Individual	Gill	Pinnock		Yes	Whole Plan	Yes	Dear Sir/Madam, Re Reg 19 consultation I believe the plan has been legally prepared and is sound.	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	
0937-0001	Individual	Jonathan	Pinnock		Yes	SP1	Yes		Yes		Over many years, Castle Point residents have insisted that all Green Belt land in the area should be protected at all costs - this policy		Not Answered	Not Answered	Not Answered	A	Supports policy SP1	Support noted.	N

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											acknowledges that desire.								
0937-0002	Individual	Jonathan	Pinnock		Yes	Thun4	Yes		Yes		This policy supports residents views that green spaces and SSSI sites around and within Thundersley should be protected and enhanced.		Not Answered	Not Answered		A	Supports policy THUN4	Support noted.	N
0937-0003	Individual	Jonathan	Pinnock		Yes	SP2	Yes		Yes		Over the years, Castle Point has become far more populated than its infrastructure can sustain with inadequate roads, medical resources etc. (Nb Residents from other boroughs travel through Castle Point to work etc and therefore junctions such as at the A127/A130, Rayleigh Weir, and Sadlers Farm are dreadfully		Not Answered	Not Answered		A	Supports policy SP2	Support noted.	N

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											congested). Ideally I would prefer no extra housing in Castle Point but recognise the unacceptable pressure placed on CPBC by the UK government in terms of housing targets. Consequently , restricting the number of new homes and particularly restricting them to Brownfield sites would seem a reasonable compromise.								
0937-0004	Individual	Jonathan	Pinnock		Yes	Thun5	Yes		Yes		It is vital to maintain the green spaces between Benfleet and Thundersley not only to maintain their uniqueness, but also to prevent the inevitable urban sprawl that would ensue if any development		Not Answered	Not Answered		A	Supports policy THUN5	Support noted.	N

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

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0937-0011	Individual	Jonathan	Pinnock		Yes	Infra 1	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA1	Support noted.	N
0937-0012	Individual	Jonathan	Pinnock		Yes	Infra 2	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA2	Support noted.	N
0937-0013	Individual	Jonathan	Pinnock		Yes	Infra 3	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA3	Support noted.	N
0937-0014	Individual	Jonathan	Pinnock		Yes	Infra 4	Yes		Yes				Not Answered	Not Answered		A	Supports policy INFRA4	Support noted.	N
0937-0015	Individual	Jonathan	Pinnock		Yes	Infra 6	Yes		Yes				Not Answered	Not Answered		A	Supports policy INFRA6	Support noted.	N
0937-0016	Individual	Jonathan	Pinnock		Yes	T1	Yes		Yes		There are already road junctions and roads that are consistently over-congested in Castle Point. Note that it isn't only Castle Point residents that use roads within the borough and with other councils being forced to also		Not Answered	Not Answered		A	Supports Policy T1	Support noted.	N

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											increase their housing stock levels, this problem is set to become even worse. Proper measurements of traffic at these key locations should be undertaken with local residents in attendance so that those measurements are taken at appropriate times. Some previous traffic measurements have been undertaken at times when it is known that traffic is lighter than usual. Authorities should resolve existing traffic congestion within Castle Point and on its boundaries with other boroughs before even								

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											considering increasing housing. No housing should be located near an existing traffic hotspot e.g. A127/A130 junction, Rayleigh Weir, Sadlers Farm, Woodmans Arms, or where those junctions could be adversely affected by the additional traffic from extra homes built nearby.								
0937-0017	Individual	Jonathan	Pinnock		Yes	T2	Yes		Yes				Not Answered	Not Answered		A	Supports Policy T2	Support noted.	N
0937-0018	Individual	Jonathan	Pinnock		Yes	T4	Yes		Yes				Not Answered	Not Answered		A	Supports Policy T4	Support noted.	N
0937-0019	Individual	Jonathan	Pinnock		Yes	T5	Yes		Yes				Not Answered	Not Answered		A	Supports Policy T5	Support noted.	N
0937-0020	Individual	Jonathan	Pinnock		Yes	T7	Yes		Yes				Not Answered	Not Answered		A	Supports Policy T7	Support noted.	N

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0462-0001	Individual	Susan	Pitcher		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0463-0001	Individual	Georgia	Pitcher		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0490-0001	Individual	Neil	Pitcher		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
1028-0001	Individual	Jade and Michael	Pittman		Yes	SP3	No		No	Effective, Justified	It's not 'appropriate' to build that much on Canvey without a third road. The infrastructure can't cope and from what I've seen of the plan they aren't going to meaningfully ensure that it's improved. How can you take away business areas and not sensibly plan for the future of employment on Canvey that will just force more people off the Island and	See previous answer.	No	Not Answered	Not Answered		Concerned regarding the amount of homes planned for Canvey Island Concerned regarding the loss of employment space Infrastructure	Comments noted The plan does not reduce the amount of employment space and plans for employment growth on Canvey Island 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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											cause more carnage at Sadler's farm roundabout which affects all of us in Benfleet as well. The numbers for Benfleet, Thundersley, etc. seem a lot more reasonable, and you should have the same approach for Canvey as well. I want to protect the green belt but I also want a fair plan that reflects the needs of the area more. If you can't get the numbers down more, you should see if neighbouring areas are willing to take on some of our numbers, and if you can't then you should look at building in a way where the new builds don't									

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											have loads of cars and instead have good public transport options.								
1008-0001	Individual	Monica	Pitts		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley and 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/greybelt against new NPPF guidelines. It is not justified, the site selection strategy is based and predetermined towards a "no Greenbelt build policy". It is solely based on the "over development of brownfield sites", has not considered all sites, with no Greenbelt/greybelt sites added and the exclusion of north west	Add North West Thundersley site, 187 Ha, as a Greenbelt/brownfield site option for 7,500 homes, reduce the urban housing target to 3,500 from 6,200 with Canvey at 1,050 and Gsdkeigh at 305. Total housing target of 11,000	No	Not Answered	Not Answered		Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the 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	N

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											Thundersley site. I do totally agree with Had 2 Policy for the Hadleigh Farm area which states this site as environmental, recreational, nature recovery, biodiversity, agricultural farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space promoting the heritage site, the Castle and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 policy is about							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 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,	

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											protecting this greenbelt as not suitable for development but this unsound plan for 6,200 homes puts the Hadleigh farmland site (GB8), at risk to speculative development, needing planning objections with respect to urban sprawl. It is a buffer zone. The effect on highways and traffic - lack of infrastructure , protecting our farmland and wildlife, out of character, open space, heritage, archeology, promoting historic lincs and greybelt land must be used first. Any development on this site affects both Hadleigh and the neighbouring area of Leigh on Sea. I can							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. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley	

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											fully support this HAD2 policy with no housing development ever on this farmland site and hopefully SA 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							transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, 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	

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																		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 safeguarded by policy HAD6	

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0508-0001	Individual	Pat	Plant		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0508-0002	Individual	Pat	Plant		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					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	N

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											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.							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. 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.	

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0508-0003	Individual	Pat	Plant		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
0944-0001	Individual	Sharon	Playle		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0908-0001	Individual	Rosalynn	Pocklington		Yes	HAD2	No	Building on green belt is not legal therefore all housing or buildings planned on the Salvation Army farmland is not legal. It has also not considered local consultation fully.	No	Justified	There is no justification for building on green belt or changing the accepted use of agricultural land to building land. There are plenty of brown land sites to be used.	Use brown land sites only and provide adequately for schools , doctors and roads.	No	Not Answered	Not Answered	B - see 0908 - 0002 .	No building on HAD2 Infrastructure	HAD2 is not proposed for built development Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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0908-0002	Individual	Rosalynn	Pocklington		Yes	Thun2	Not Stated		Not Answered		The plan is to 'optimise civic and educational facilities' with which I agree, but to build 730 new houses is far too many. With all the new housing already around the area ,what is really needed is a new school on this site, along side the nursery already proposed. A new doctors surgery or medical centre /dentist to replace the lost clinic would serve the community far better than an increase in housing, overloading the current facilities. A link to Thundersley centre is mentioned. I hope that this would not mean a road		No	Not Answered	Not Answered	None	Objecting to the amount of housing on THUN2. Requesting more infrastructure and no vehicular access to thundersley village No shops on site	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Thun2 requires a masterplan to ensure that any vehicular accesses are properly planned and that it is a cohesive development.	N

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											into the Village bringing traffic chaos . However, an improvement to the current footpath would be valuable, along with cycling path. It would be best if most of this planned area behind the council offices were pedestrian only, making a safe environment for children, swimmers, mothers with prams ,etc. and include a play park. So thought should be given to adequate parking off Kiln Road, perhaps 2 or 3 storey high to save space. Any new homes built in this area could be built with a double garage at ground level, and the main								

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											house above. This would save any problems with flooding, as only the car would get wet. This housing should be designated to local people and be on an affordable scheme or kept as social housing. I don't think any shops should be on this site. This area could be of great benefit if it is properly planned.								

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0610-0001	Individual	Joan	Pope		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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0610-0002	Individual	Joan	Pope		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					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	N

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											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.							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. 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.	

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0610-0003	Individual	Joan	Pope		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
0318-0001	Individual	Chris	Port			Had4	Not Stated	Hello, I tried to sign and comment on the above sites application /plan but when on website i simply received 'error code 404'I which may or may not have been intentional and was unable to complete the form. The idea of 114 new homes in such a small area is without	Not Stated	Not Stated						A	Objects to Scrub Lane site. Overdevelopment, impacts on highways and education infrastructure.	<u>Infrastructure</u> Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). <u>Highways Impacts</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	N

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								doubt not in keeping with the immediate area and will simply be an eyesore no matter how high the development has to be built . The council are already struggling with finances and so keeping in mind a certain percent of this development will go to unemployed families....it will add to the weight of financial problems the council has. The council has said on many occasions that it is struggling so is this true or not . The homes will attract 1.8 cars per											

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								household which means a further 200 cars will hit the immediate area which will cause many traffic problems which will over flow into nearby neighbourhoods . The schools are already over subscribed and the new homes which will house 800 new people 200 of which will be children of school age will well over burden the schools capacity AND will push locals out...locals who have contributed to the area themselves via council tax over the years. The											

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								whole idea of this amount of homes is ridiculous ,a third of this amount would suffice and part of the area must be kept as recreational for obvious reasons. thanks,Mr Chris Port ,local resident .											

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0574-0001	Individual	Sharon	Porter		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	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 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	N

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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.	
0574-0002	Individual	Sharon	Porter		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					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	N

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											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.							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. 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.	

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0574-0003	Individual	Sharon	Porter		Yes	Fore word					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 on this matter has been published and the					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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											meetings were poorly advised. 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.								
1327-0001	Individual	Sharon	Porter			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.		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

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
1327-0002	Individual	Sharon	Porter			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	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 should 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 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	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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											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.							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 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	

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																		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 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	

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																		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 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.	
1327-0003	Individual	Sharon	Porter			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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1237-0001	Individual	John	Potts			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	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	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, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	<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 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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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 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						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	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 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1237-0002	Individual	John	Potts			Hou5		The plan has included Thorney Bay development for 173 homes, so									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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								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.											
1237-0003	Individual	John	Potts			C4					The number of Canvey West homes puts residents in the East at risk with emergency						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

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											evacuation procedures.						living at East Canvey		
0869-0001	Individual	Clare	Poulson		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0872-0001	Individual	James	Poulson		Yes	Whole Plan	Yes		Yes	Positively prepared, Effective, Justified, Consistent with national policy			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N
1252-0001	Individual	Anastasia	Power			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	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 predetermine	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	<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 of All Sites</u> All reasonable option	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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
								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.			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 , the proposed 3316 urban homes for Canvey is not resident led						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	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 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	

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																		Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1252-0002	Individual	Anastasia	Power			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1252-0003	Individual	Anastasia	Power			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
0382-0001	Individual	Chris	Prentice		Yes	SP3	Yes	I fully support consultation with local residents and think council should be commended for creating a proposal that aims to satisfy the desires of existing residents. I fully support the urban first	Yes							A	I fully support consultation with local residents and think council should be commended for creating a proposal that aims to satisfy the desires of existing residents. I fully support the urban first approach and except existing "Brown Field" sites to be redeveloped	Support noted	N

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								approach and except existing "Brown Field" sites to be redeveloped and that green field (or grey field) sites should be left as they are. I think there is a need to create nice affordable properties, and more social housing and agree with a housing mix that favours smaller properties and denser developments. I agree with Local Housing Needs Assessment versus standard methodology. Building 255+ homes a year is significantly greater than 99 homes									and that green field (or grey field) sites should be left as they are. I think there is a need to create nice affordable properties, and more social housing and agree with a housing mix that favours smaller properties and denser developments. I agree with Local Housing Needs Assessment versus standard methodology. Building 255+ homes a year is significantly greater than 99 homes built during each of the last 10 years.		

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								built during each of the last 10 years.											
0382-0002	Individual	Chris	Prentice		Yes	Had1	Yes	I am surprised and disappointed that this site, which I agree is totally suitable for redevelopment, can only accommodate 388 new homes. The site is well served by public transport and has car parking nearby so I do not see why more homes could not be built? I am told that there is reluctance or resilience from Essex County Council to engage with Castle Point with particular regard to including	Yes							A	Would like more homes to be provided on this site. there is reluctance or resilience from Essex County Council to engage with Castle Point with particular regard to including the library and old fire station within the redevelopment. How can our local council be criticised for not creating sufficient new homes when third parties do not support making better use of existing underutilised Brown Field Sites?	The density of the site has been informed by the Density and Capacity study, please see this for further information. The Hadleigh Island site which includes the library and the old fire station is included within HAD1 and the is anticipated to provide 74 homes and 908m2 of non residential floor space.	N

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								the library and old fire station within the redevelopment. How can our local council be criticised for not creating sufficient new homes when third parties do not support making better use of existing underutilised Brown Field Sites?											
0382-0003	Individual	Chris	Prentice		Yes	Thun 2	Yes	I fully support making better use of existing developed sites, and haven't seen a specific proposal for this site but wouldn't want new homes to be at the expense of provision of further education for young people. We	Yes							A	Concern regarding the loss of education provision for young people	Policy THUN2 requires a master plan to be produced with a phasing plan to ensure that the education provision on or off site has a timely delivery.	N

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								need to ensure young people have the skills necessary to be usefully employed, and to earn a salary that will ultimately offer a comfortable standard of living.											
0382-0004	Individual	Chris	Prentice		Yes	T2	Yes	It is important to create employment for local residents, but would like to see better infrastructure, in particular roads that allow for movement of freight with disrupting other motorists, cyclists and pedestrians. The A127 between Rayleigh Weir and Fairglen interchang	Yes							A	better infrastructure, in particular roads that allow for movement of freight with disrupting other motorists, cyclists and pedestrians, How can we have a local plan that does not provide infrastructure?	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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								e is totally inappropriate for the volume of traffic, but I am told this is the responsibility of Essex County Council. How can we have a local plan that doesn't provide infrastructure?											

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0544-0001	Individual	Jean	Preston		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	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 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	N

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											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							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 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	

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											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 Canvey's residents are of the same opinion.							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 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	

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																		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. 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	

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																		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.	
0544-0002	Individual	Jean	Preston		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					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	N

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											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.							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. 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.	

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0544-0003	Individual	Jean	Preston		Yes	Fore word					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 on this matter has been published and the					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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											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.								

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0928-0001	Individual	Sam	Preston		Yes	HAD4	No	It has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Positively prepared, Justified, Consistent with national policy	Justified - whilst it states that building should be in keeping with the aesthetic of Scrub Lanes other homes, it fails to account for 114 homes squeezed into a space that the rest of scrub lane would expect a maximum of 20 homes. The homes in this area have green spaces for families and do not seek to squeeze. Additionally the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added,	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Revise Scrub Lane development to 20 family homes. Total housing target of 11,000.	No	Not Answered	Not Answered	A	North West Thundersley No five year housing land supply Objecting to number of houses on HAD4 Green/Grey Belt	North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. No Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to 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	N

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											and the exclusion of the North West Thundersley site. Consistent with national policy: It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of												five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Density on HAD4 The density chosen for this site was informed	

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											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								by the Density and Capacity Study July 2025, please see this for further details. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of 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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											lights. The local plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure , sewage and drainage, and flooding implications. The plan also needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. Adding the							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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											North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.								
0965-0001	Organisation	Michael	Priaulx	Swifts Local Network: Swifts & Planning Group	Yes	ENV5	Yes		No	Effective	This policy and clause is very welcome and positive to implement NPPG swift brick guidance, but to make it fully sound and effective we request that you add "or equivalent" after "British	To make this clause fully sound and effective, we request that you add "or equivalent" after "British Standard BS 42021:2022". If preferred, instead write "such as" before "British Standard..."	Yes	Not Answered	Not Answered	A	This policy and clause is very welcome and positive to implement NPPG swift brick guidance, but to make it fully sound and effective we request that you add "or equivalent" after "British Standard BS 42021:2022",	Noted and agreed	1. For any grant of planning permission for new build developments greater than 5 metres in height, ~~that~~ there must be a minimum average of one swift brick or box per dwelling

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											Standard BS 42021:2022", for flexibility, because the British Standard may be updated, or other newer best-practice guidance be published, and small projects may not have access to the British Standard. If preferred, instead write "such as" before "British Standard..."						for flexibility, because the British Standard may be updated, or other newer best-practice guidance be published, and small projects may not have access to the British Standard. If preferred, instead write "such as" before "British Standard..."		or unit. Where feasible, swift bricks integrated into walls must be installed in preference to external swift nest boxes, following best practice guidance (British Standard BS 42021:2022 or equivalent)
1279-0001	Individual	Alan	Price			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	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	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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						predetermined towards a "no Greenbelt build 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 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 options 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 GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in	

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											unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led							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.	
1279-0002	Individual	Alan	Price			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1279-0003	Individual	Alan	Price			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
1437-0001	Individual	Linda	Prigmore		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support Noted	N
0473-0001	Individual	Peter	Prockter		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0474-0001	Individual	Carol	Prockter		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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0246-0001	Individual	Paul Leslie	Prosho		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. > I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically		Not Stated		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											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.						urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0246-0002	Individual	Paul Leslie	Prosho		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures .	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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1309-0001	Individual	Kay	Pumfrey			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	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 should 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 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	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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											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.							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 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	

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																		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 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	

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																		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 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.	
1309-0002	Individual	Kay	Pumfrey			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
1309-0003	Individual	Kay	Pumfrey			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park		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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											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.								
0106-0001	Individual	Bernadette	Purcell		Yes	SP3	No	Dear Sir/Madam I do NOT support the Castle Point Plan Regulation 19 Draft Consultation. I consider the Castle Point Plan Regulation 19 Draft to NOT be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year			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	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes, reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, and a total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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

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											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.						target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
0106-0002	Individual	Bernadette	Purcel		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0790-0001	Individual	Debbie	Purkis	Deborah Jean	Yes	SP3	No	Failed to consider strategic alternatives for example North West Thundersley. No credible 5 Year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with National Policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/Grey Belt against new NPPF guidelines. The Draft Local Plan is not justified. Site selection strategy is biased and predetermined towards a "No Greenbelt build policy". Site selection is based on the "over development of Brownfield sites " Not considered all sites, no greenbelt/grey belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development	Add North West Thundersley site, 187Ha, a Greenbelt/GreyBelt/Brownfield option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000	No	Not Answered	Not Answered	A	Not meeting standard method Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for	N

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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 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures							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 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	

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																		Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of	

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																		greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. 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. 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 Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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1014-0001	Individual	Harry	Pyle		Yes	HAD4	No		No			This site will produce a lot more traffic on an already busy route. Also at peak times and school times, the road is often down to one way due to the number of parked cars on dropping off/picking up times	No	Not Answered	Not Answered		Objecting to HAD4 due to traffic concerns	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