Castle Point Together
Your community your views

Regulation 19 Consultation Spreadsheet

Representations and Responses to the HRA

Ordered by ID number

January 2026

ID	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Future Notifications requested?	Comment	Summary	CPBC Officer Response	Modification required? Y/N
HRA - 001	Individual	Hazel	Benjamin	Not stated	Yes	Yes	all i have wanted to do over the years ,is save our wildlife and green belt and everything should be done to protect it all at all costs ,as long as that's not touched especially CB1/CB2/CANVEY WAY MEMORIAL AVENUE WHICH EVER THEY WANT TO CALL IT ,B9 ARUTHER STEVENS PLAYING FEILDS JOTMANS HALL FARM , ALL THIS GREEN BELT SHOULDNT BE TOUCHED IT IS TOO LOVELY TOO LOSE,NOT JUST FOR OPEN SPACE BUT WILD LIFE,WE SEE SO MUCH LIVING HERE AND DONT WANT TO LOSE IT ,COVID TAULT US EVEN MORE HOW VALUBLUE THIS GREEN BELT IS ,	Protect Green Belt at all costs.	Not a comment on the HRA, but on the Castle Point Plan. However, it should be noted that the Castle Point Plan is recognises the key principle of protecting the Green Belt and no development sites are allocated within it.	N
HRA - 002	Individual	Helen	Morris	Not stated	Yes	Yes	In relation to HAD4 Scrub Lane, the proposal to build 114 homes on this site is ridiculous. The local roads cannot support the extra cars as parking is bad enough already. I note there is a loss to the playing field of the infant school which is also used by the junior school. Homes are needed, but not at any cost. I'm not against using this land, but this proposal is for far too many to be a nice place to live and to keep the local infrastructure balanced.	Objects to Scrub Lane development	Not a comment on the HRA, but on the Castle Point Plan. Comments noted.	N
HRA - 003	Individual	Steven	McGregor	Not stated	Yes	Yes	A tunnel should be considered to reduce mitigation costs	A tunnel should be considered to reduce mitigation costs	Noted	N
HRA - 004	Individual	Jeanette	Parker -East	Not stated	Yes	Yes	I have no adverse comments to make.	I have no adverse comments to make.	Noted	N

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HRA - 005	Individual	Linda	King	Not stated	Yes	Yes	Habitats are extremely important and we feel to keep the good balance that we have in castle point especially in Hadleigh the precious Salvation Army farm land should Not even be considered at all it has always been there for the community to appreciate and enjoy for their well-being and to allow wild life to have a permanent home. Any more additional housing in this area will be extremely detrimental to our infrastructure and the lives and wellbeing of the residents. It's already an over populated area with horrendous traffic congestion.	Protect Hadleigh Salvation Army farm	Noted. The site is not allocated for development in the Castle Point Plan.	N

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HRA - 006	Organisation			Natural England			Natural England (NE) agree with the policies and allocations screened in for appropriate assessment (AA) and previously advised that it is satisfied with the conclusions of the HRA Scoping Report (Place Services, May 2024) with regards to the relevant Marine Protected Areas (MPAs). NE note that the Local Plan has embedded mitigation within the Reasoned Justification for SD1 to avoid Adverse Effects on Integrity from planned tidal flooding stemming from the Thames 2100 Plan, as this is supported by Policy SD1. It is recognised that compensation will be required for the loss of terrestrial habitat within Benfleet and Southend Marshes SPA and Ramsar Site. NE would prefer that flood management measures avoid the loss of designated habitat entirely, but NE recognise that this may not be feasible given the local area. Identification and development of compensatory habitat is a complex and resource intensive process and NEwould like to be consulted at as an early a stage as possible to ensure that any compensatory measures are sufficient. NE would encourage Castle Point to identify compensatory sites well in advance as there are high levels of competition for suitable sites in and around the	We agree with the policies and allocations screened in for appropriate assessment (AA). As indicated in section 2.3.2 of the report, Natural England has previously advised that it is satisfied with the conclusions of the HRA Scoping Report (Place Services, May 2024) with regards to the relevant Marine Protected Areas (MPAs). The Scoping Report considered that “a Marine Conservation Zone Assessment for the Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone (MCZ) is not currently required due to the distance between the Castle Point LP Area and the MCZ (Over 4km) and development within the Local Plan boundary is unlikely to impact the MCZ features”. We note that the AA has made a number of recommendations to enable the Plan to avoid adverse effects on the integrity of any Habitats sites, either alone or in combination with other plans and projects, which have been incorporated into the Plan. Section 7.1.3 states: The Local Plan has embedded mitigation within the Reasoned Justification for SD1 to avoid Adverse Effects on Integrity from planned tidal flooding stemming from the Thames 2100 Plan, as this is supported by Policy SD1. It is	Modification to Castle Point Plan paragraphs 21.13 and 21.18 proposed in response to Natural England's comments.	Yes. Local Plan 21.13 - The TE2100 Plan, prepared by the Environment Agency and partners, sets out a policy for the maintenance and improvement of the sea defences on Canvey Island in line with climate change projections. Improvements have already been delivered to the Island’s southern revetments and will be required over the next 40 years to keep up with climate change. The Council will work with the Environment Agency to ensure that these ongoing improvements are delivered. Any works to retain or enhance sea walls, or within the 19m safeguarded buffer zone, should **prioritise** avoid**ing the loss of designated habitat or** causing adverse effects on site integrity. This will need to be demonstrated through a project level HRA. Local Plan 21.18 The loss of inter-tidal marshland habitats. The Benfleet and Southend Marshes is designated as a Special Protection

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							Thames estuary. 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. The report concludes that adverse impacts upon water quality can be achieved through the delivery of the Asset Management Plans of the water supply company and the drainage undertakers, through the use of SuDS and ensuring that Water Recycling Centres (WRCs) have the capacity to accommodate growth. NE is satisfied with this, noting Policy SD9 water supply and waste water requirements; in particular, that all new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development including confirmation that there is adequate quantitative and qualitative capacity at the WRC that will serve the development. We agree with the other mitigation measures that have been put forward (see 7.1.6) including the requirement for 'down-the-line' assessment (7.1.7) using the best available evidence (7.1.8).	recognised that compensation will be required for the loss of terrestrial habitat within Benfleet and Southend Marshes SPA and Ramsar Site. Natural England would prefer that flood management measures avoid the loss of designated habitat entirely, but Natural England recognise that this may not be feasible given the local area. Identification and development of compensatory habitat is a complex and resource intensive process and Natural England would like to be consulted at as an early a stage as possible to ensure that any compensatory measures are sufficient. We would encourage Castle Point to identify compensatory sites well in advance as there are high levels of competition for suitable sites in and around the Thames estuary. 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. The report concludes that adverse impacts upon water quality can be achieved through the delivery of the Asset Management Plans of the		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 level Habitats Regulations Assessment.

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HRA - 007	Individual	julie	robbins	Not stated	Yes	Yes	we can't accommodate more housing, this world isn't just for people, are wildlife has no where to go, In my garden already have a fox family, they would normally be living in their natural habitat which are now being built on, pushing and evicting them out of their homes, I do not feed them as I wouldnt encourage this, foxes are wild animals and shouldn't be in my garden. but I let them stay as they have limited places to go, traffic is absolutely horrendous,	We can't accommodate more housing, this world isn't just for people, concerned about loss of natural habitat to development. Traffic is absolutely horrendous, and only getting worse.	Not a comment on the HRA, but on the Castle Point Plan. Comments noted.	N

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							and only getting worse, thundersley and benfleet are rammed of people and traffic now, no more ruining our land, this has to stop!!			
HRA - 008	Individual	Janet	Thorne	Not stated	Yes	Yes	No way should more houses be built on Canvey unless a new road off is built. Traffic is a huge problem already .	Object to more houses be built on Canvey unless a new road off is built. Traffic is a huge problem already .	Not a comment on the HRA, but on the Castle Point Plan. Comments noted.	N