

THE CASTLE POINT PLAN



Your community. Your views.

Regulation 22 Consultation Statement

Representations and Responses

Feedback Report

January 2026



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1. Introduction

- 1.1 In 2022, Castle Point Borough Council (“the Council”) agreed to commence the production of the Castle Point Plan (CPP) based on the principles that there will be public consultation and engagement with the wider community and stakeholders in accordance with the Statement of Community Involvement (SCI) 2020. The SCI sets out how the community and other stakeholders will be engaged and consulted on local planning policy documents.
- 1.2 Between January 2023 and August 2023 engagement took place on issues with partners, the community, local businesses, and other stakeholders. This was set out in the: [Initial Engagement Outcomes Report 2023 \[pdf\] 4MB](#). This stage of engagement was focused on determining the scope of the issues to be addressed through the Castle Point Plan. It was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 Feedback from that early consultation stage was used in the development of the Issues and Options consultation document which outlined the options available for the development and use of land in the Borough.
- 1.4 The Issues and Options consultation document set out the preferred spatial strategy and options for new homes and jobs for the future growth and development of the Borough up to 2043 including site options. This consultation took place between 22 July and 16 September 2024 also in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The document summarises the key issues that will be covered in the new Castle Point Plan by asking a series of questions. The representations and feedback received from this consultation can be found in the: [Issues and Options Consultation Document July 2025](#).
- 1.5 The responses from this consultation has been used to inform the development of the Castle Point Plan. This is a 17 year plan covering the period 2026-2043 which identifies the location of development including housing, infrastructure and commercial, policies to safeguard the environment and enable climate change mitigation, policies to secure high quality design and specifies requirements of housing need within the Borough.
- 1.6 This consultation took place between 1st August and the 26th September 2025 carried out in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.7 A further Regulation 19 consultation was undertaken between 24th October and 5th December 2025 in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This was as a consequence of a technology error, there was an earlier version of the Local Plan that appeared on the Council’s website which could be construed as being subject to consultation. This earlier incomplete draft was, for a period, accessible within the online consultation form only. The correct version of the Local Plan was published in all other relevant places including on the Council’s website landing page, council offices and libraries. As a consequence of this technology error the Council undertook further consultation on the Castle Point Plan to ensure that everyone has the opportunity to make

representations on the correct version of the plan.

2. Purpose of the Document

- 2.1 This document sets out the process undertaken by the Council for community participation and stakeholder involvement in producing the Local Plan. It also sets out how the main issues raised through the various consultations have helped to shape the Castle Point Plan.
- 2.2 The Consultation Statement has been prepared to meet the requirements of Regulations 18, 19 and 22 (1) Part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Consultation Statement will assist the Inspector and other stakeholders at the Examination in Public to determine whether the processes that the Council followed, leading to the Submission of the Castle Point Plan, comply with Government guidance and requirements for public participation.
- 2.3 In detailing what the requirements are for the 'Submission of documents and information to the Secretary of State', Regulation 22 (1) Part (c) of the 2012 Regulations directs the Council to prepare a statement which sets out the following:
 - Which bodies and persons the Council invited to make representations under Regulation 18;
 - How these bodies and persons were invited to make representations under Regulation 18;
 - A summary of the main issues raised by the representations.
 - How many representations made pursuant to Regulation 18 have been taken into account;
 - If representations were made pursuant to Regulation 20, the number of representations made, and a summary of the main issues raised; and
 - If no representations were made in Regulation 20, that no such representations were made.
- 2.4 The previous Consultation Statement complying with the requirements of Regulation 18 stage of the Town and Country Planning (Local Planning) (England) 2012 Regulations, can be viewed here: [Issues and Options Consultation Document July 2025](#).
- 2.5 This statement will demonstrate how the Council has involved the community and interested parties in complying with the requirements of Regulation 19, 20 and 22 stages of the Town and Country Planning (Local Planning) (England) 2012 Regulations.
- 2.6 Public consultation has taken place within the context of para. 16(c) of the National Planning Policy Framework (NPPF) 2024 which states:

"Local Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees."
- 2.7 In addition to complying with these regulations, this statement also demonstrates that the consultation on the preparation of the Castle Point Plan has been undertaken in accordance with

the adopted Statement of Community Involvement (SCI) 2020.

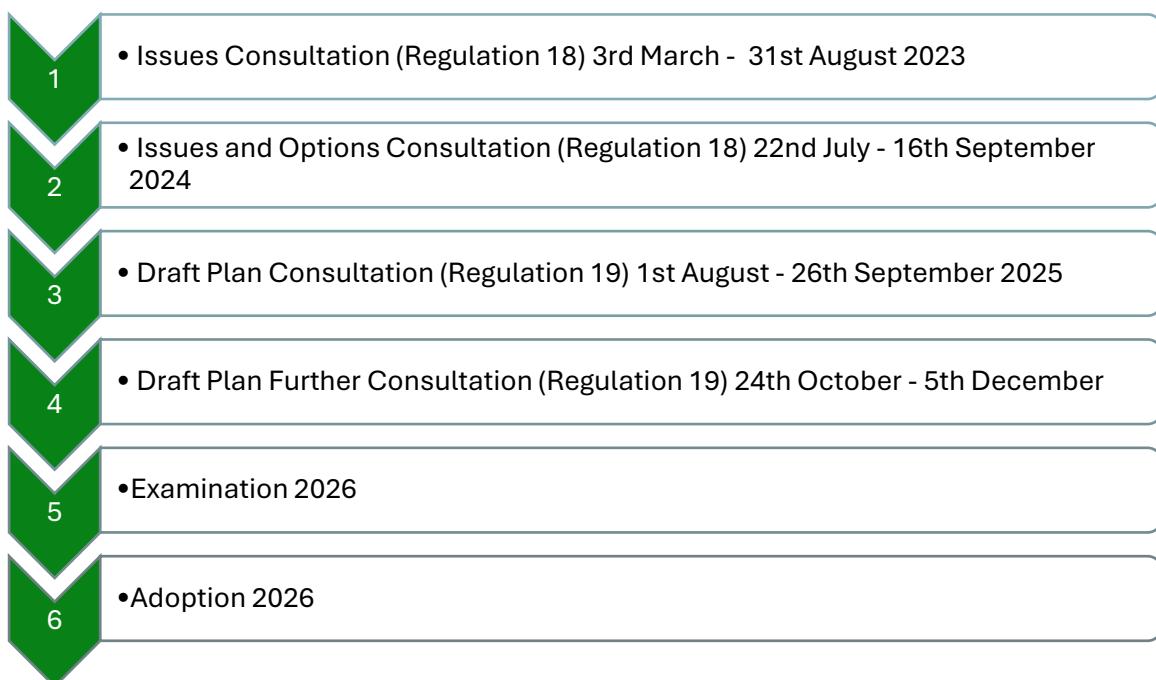
2.8 The SCI document sets out how the council will consult and involve the public and statutory consultees in planning matters. The Council has followed this approach in producing the Castle Point Plan. Full details of the adopted SCI can be viewed here: [Castle Point SCI 2020](#)

3. Approach to the Consultation

Timeline

3.1 As detailed above the creation of the Castle Point Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the district in terms of strategy and the policies required.

3.2 The below timetable outlines the main consultation stages of the emerging Castle Point Plan up until the submission date and anticipated dates for examination and adoption.



3.3 Below is a brief summary of each stage of consultation and the key issues arising. The table also signposts to relevant documents with further information.

Consultation Stage	Dates	Outcome Report	Additional Consultation at this stage	Local Development Scheme (LDS)
Issues (Regulation 18)	3 rd March – 31 st August 2023	Initial Community and	The Local List of Heritage Assets	LDS

		<u>Stakeholder Engagement</u>	nominations Local Wildlife Site Review Nominations	
Reasons and Purpose:				
<ul style="list-style-type: none"> • The resolution to produce a new plan was taken by Full Council in 2022. • The purpose of this consultation was to identify the key issues that should be addressed in the Castle Point Plan. 				
Key outcomes:				
<ul style="list-style-type: none"> • Key themes were identified as “Tags” and these themes were used to draft the Castle Point Plan. • Key outcomes were fed into the draft Castle Point Plan. • Statutory consultees identified key evidence that should be undertaken and/or incorporated in the draft Castle Point Plan. 				
Issues reg 18 addendum	October 2023 – January 2024	<u>Initial Community and Stakeholder Engagement Addendum</u>		<u>LDS</u>
Reasons and Purpose:				
<ul style="list-style-type: none"> • The Initial Engagement undertaken did not effectively reach certain elements of the community, specifically young people, neighbouring authorities and local businesses. 				
Key Outcomes:				
<ul style="list-style-type: none"> • Youth Engagement through engagement through art and USP college • Neighbouring Authorities Engagement • Local Businesses and other local service providers Engagement 				
Issues and Options (Regulation 18)	22 nd July – 16 th September 2024	<u>Issues and Options Consultation Statement</u>	EQIA scoping report The SA and SEA scoping report and initial assessment of strategic options South Benfleet conservation area character appraisal and management	<u>LDS</u>

			plan and design code.	
Reasons and Purpose:				
<ul style="list-style-type: none"> • To set out the preferred spatial strategy and options for new homes and jobs for the future growth and development of the Borough up to 2043 including site options 				
Key Outcomes:				
<ul style="list-style-type: none"> • Feedback was carefully considered and incorporated into the draft Castle Point Plan. 				
Castle Point Plan (Pre-submission) (Regulation 19 and 20)	1 st August – 26 th September 2025	This report	Sustainability Assessment and Strategic Environmental Assessment of the Castle Point Plan (Regulation 19 Draft) Habitat Regulation Assessment of the Castle Point Plan (Regulation 19 Draft) Equality Impact Assessment of the Castle Point Plan (Regulation 19 Draft)	LDS
Reasons and Purpose:				
<ul style="list-style-type: none"> • The submission ready version of the Castle Point Plan was made available for stakeholders and the public to comment on. In accordance with the Local Plan Regulations, this consultation was formal and statutory seeking specifically comments upon the Plan's soundness 				
Key Outcomes:				
<ul style="list-style-type: none"> • Some modifications are proposed as a result of the comments received during the consultation. 				
Castle Point Plan Re-consultation (Pre-	24 th October – 5 th December 2025	This report	Sustainability Assessment and Strategic Environmental Assessment of	LDS

submission) (Regulation 19 and 20)		the Castle Point Plan (Regulation 19 Draft) Habitat Regulation Assessment of the Castle Point Plan (Regulation 19 Draft) Equality Impact Assessment of the Castle Point Plan (Regulation 19 Draft)	
<p>Reasons and Purpose:</p> <ul style="list-style-type: none"> As a consequence of a technology error, there was an earlier version of the Local Plan that appeared on the Council's website which could be construed as being subject to consultation. This earlier incomplete draft was, for a period, accessible within the online consultation form only. The correct version of the Local Plan was published in all other relevant places including on the Council's website landing page, council offices and libraries. As a consequence of this technology error the Council is undertaking further consultation on the Castle Point Plan to ensure that everyone has the opportunity to make representations on the correct version of the plan. 			
<p>Key Outcomes:</p> <ul style="list-style-type: none"> Some modifications are proposed as a result of the comments received during the consultation. 			

Submission to the Secretary of State 2026

3.4 The Council has assessed the comments received during the Regulation 19 formal consultation and re-consultation. The council considers that the Pre-submission Castle Point Plan is sound, therefore, can be submitted for Examination in Public (EiP). However, a Schedule of Modifications has been prepared to submit with the local plan to provide the Inspector with the most up-to-date position, to address any issues that have been raised through the latest representations received to the Regulation 19 consultations and other changes considered necessary to ensure clarity and consistency. The fundamental strategic approach set out in the Pre-submission Castle Point Plan is unchanged by these proposed Modifications. The Plan will be submitted to the Secretary of State.

Examination 2026

3.5 The plan will be examined by an independent Planning Inspector. That Inspector may identify modifications to the plan required to make it sound. Those modifications will be subject to consultation at an appropriate time. The Council has requested in a letter accompanying the submission documents, whether the Inspector requires the Council to undertake consultation on the schedule of Council Proposed Modifications prior to the Examination in Public.

Adoption 2026

3.6 It is anticipated that the Council will formally adopt the Local Plan at this stage.

4. Castle Point Plan (Pre Submission Regulation 19 and 20 Consultation)

4.1 The Council published the Pre-submission Castle Point Plan for consultation 1st August 2025, pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Castle Point Plan was subject to 8 weeks of consultation.

4.2 In total 1,074 responses were received from individuals and organisations. In total 1,106 representations were recorded. This includes 18 duplicates, 14 entries entered in error and 10 respondents who did not give us permission to publish, and 1 respondent withdrew their permission to publish their response.

4.3 The full list of schedule of responses will be made available on the Castle Point Website.

4.4 The Castle Point Plan, evidence base and link to the consultation was available on the Council Website (Appendix 1).

4.5 The consultation took the form of an online survey using Citizen Space Software (Appendix 2).

4.6 The consultation was also supported by a series of in person engagement events in community spaces across the Borough. Appendix 3 details the dates, times and locations of these events.

4.7 Attendees of the events were asked to sign in, Appendix 4 shows these sign in sheets.

4.8 Upon publication, 42 formal notification letters and 2,379 formal notification emails were sent to individuals or organisations on the consultation database to invite them to make representations on the Castle Point Plan (Pre-Submission) and supporting documents. This letter/email can be found at Appendix 5.

4.9 Residents without access to the internet were able to complete and return hard copy response forms (Appendix 6). These were provided when requested at consultation events, for collection from local libraries or hand delivered to home addresses if requested to ensure everyone was given the opportunity to complete the survey.

4.10 The Castle Point Plan Regulation 19 Consultation, Policies Map and entire evidence base was made available to view online [here](#). In addition to this, the following documents were available for public inspection at the Local Libraries, Council Leisure Centres and Council Offices:

- Castle Point Plan Regulation 19 Consultation – July 2025
- Castle Point Plan Regulation 19 Draft Policies Map
- Castle Point Plan Regulation 19 Draft Summary Document – July 2025
- Sustainability Appraisal – Main Report – July 2025
- Sustainability Appraisal – Appendices – July 2025
- Sustainability Appraisal – Non Technical Summary – July 2025
- Habitat Regulations Assessment – July 2025
- Equality Impact Assessment – July 2025
- Infrastructure Delivery Plan
- Consultation Response Booklet

4.11 In addition, the consultation was publicised using the following methods:

4.12 An advert was placed in the Local Press at the beginning of the consultation (Appendix 16);

- A press release was issued early in the consultation period (Appendix 7);
- Letters or emails were sent to statutory consultees, special interest groups, developers, landowners and those who had asked to be contacted on the consultation database;
- Letters or emails were sent to neighbouring authorities notifying them of the consultation;
- Meetings were offered to all Essex authorities (including Essex County Council) to discuss the Local Plan and consultation; 1to 1 follow up meetings were offered to those who wanted them.
- Social media was also used to reach as many in the community as possible (Appendix 8)

4.13 During the consultation, the Council's website and Consultation Response Booklet asked consultees if they would like to participate in the oral examination. Where consultees did not respond to this question, the answer defaulted to no.

4.14 A Schedule has been prepared to evidence the methods of consultation and who was consulted at this stage of the consultation. This will be made available on the Castle Point Website.

4.15 In this regard the Council is satisfied that the requirements of Regulation 22(1)(c)(v) have been met and the consultation has been conducted in accordance with the adopted statement of Community Involvement.

5. Castle Point Plan (Pre Submission Regulation 19 and 20 Further Consultation)

- 5.1 As a consequence of a technology error, there was an earlier version of the Local Plan that appeared on the Council's website which could be construed as being subject to consultation. This earlier incomplete draft was, for a period, accessible within the online consultation form only. The correct version of the Local Plan was published in all other relevant places including on the Council's website landing page, council offices and libraries. As a consequence of this technology error the Council is undertaking further consultation on the Castle Point Plan to ensure that everyone has the opportunity to make representations on the correct version of the plan.
- 5.2 The Council published the same documents for consultation 24th October 2025, pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The re-consultation was subject to 6 weeks of consultation.
- 5.3 The Castle Point Plan, evidence base and link to the consultation was available on the Council Website (Appendix 9).
- 5.4 The consultation took the form of an online survey using Citizen Space Software (Appendix 10).
- 5.5 The consultation was also supported by a series of in person engagement events in community spaces across the Borough. Appendix 11 details the dates, times and locations of these events.
- 5.6 Attendees of the events were asked to sign in, Appendix 12 shows these sign in sheets.
- 5.7 2379 emails and 42 notification letters were sent out to the contacts on the contact list and all 1074 respondents of the previous Regulation 19 consultation were contacted via email or letter. This letter can be found at Appendix 13
- 5.8 They were notified of the technology error and asked to respond choosing option A, B or C as follows:
 - A) The consultation response you submitted previously, and which is attached, was based on the correct version of the plan, and you do not wish to submit additional representations at this time;
 - B) The consultation response you submitted previously, and which is attached, was based on the correct version of the plan, but that you may wish to submit updated or additional representations; or
 - C) The consultation response you submitted previously, and which is attached, was based on the incorrect version of the plan, and you wish to submit an updated representation.
- 5.9 Those who did not respond were sent a reminder email/letter at 2 and 4 weeks into the consultation (Appendix 14).

5.10 In total 564 responses were received confirming their option choice. 533 chose option A, 26 chose option B and 5 chose option C. We also received 342 new representations which will be made available to view on the Castle Point Website.

5.11 The full list of 1,405 responses to both reg 19 consultations schedule will be made available to view on the Castle Point Website.

5.12 The Castle Point Plan (Pre-Submission), Policies Map and entire evidence base was made available to view online [here](#). In addition to this, the following documents were available for public inspection at the Local Libraries, Council Leisure Centres and Council Offices:

- Castle Point Plan Regulation 19 Consultation – July 2025
- Castle Point Plan Regulation 19 Draft Policies Map
- Castle Point Plan Regulation 19 Draft Summary Document – July 2025
- Sustainability Appraisal – Main Report – July 2025
- Sustainability Appraisal – Appendices – July 2025
- Sustainability Appraisal – Non Technical Summary – July 2025
- Habitat Regulations Assessment – July 2025
- Equality Impact Assessment – July 2025
- Infrastructure Delivery Plan
- Consultation Response Booklet

5.13 In addition, the consultation was publicised using the following methods:

5.14 An advert was placed in the Local Press at the beginning of the consultation (Appendix 17);

- A press release was issued early in the consultation period;
- Letters or emails were sent to statutory consultees, special interest groups, developers, landowners and those who had asked to be contacted on the consultation database;
- Letters or emails were sent to neighbouring authorities notifying them of the consultation;
- Meetings were offered to all Essex authorities (including Essex County Council) to discuss the Local Plan and consultation; 1to 1 follow up meetings were offered to those who wanted them.

5.15 Social media was also used to reach as many in the community as possible (Appendix 15)

5.16 In this regard the Council is satisfied that the requirements of Regulation 22(1)(c)(v) have been met and the consultation has been conducted in accordance with the adopted statement of Community Involvement

6. Analysis of Responses

6.1 The two Regulation 19 consultations were undertaken in accordance with the in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As a result of this limited data on the characteristics of the respondents themselves were collected.

Respondent by category

6.2 A total of 1,405 individuals and organisations responded to the Regulation 19 Consultation and Regulation 19 further consultation, of which 495 were made via the online consultation portal with the remainder emailed or posted.. The breakdown of response methods is set out in Table 1 below:

Table1: Response methods

Email Responses	Total Online	Letters/Hardcopy Forms	Total
347	495	563	1,405

The respondents came from a wide variety of groups and individuals including residents, developers, landowners, and their consultants, as set out in Table 2

Table2: Type of Respondents

Type of Respondent to the Reg 19 Castle Point Plan	Number
Residents and Other Stakeholders	1,339
Statutory Consultees and Duty to Cooperate Bodies	18
Non-Statutory Consultees and Interest Groups (Includes local businesses)	32
Developers and Landowners	16
Total Responses	1,405

6.3 The overwhelming majority of responses were to the main Plan consultation, with smaller numbers responding to the three concurrent consultations of supporting documents, as set out below in table 3.

Table3: Responses by Consultation

Reg 19 Respondents by Consultation	Number
Castle Point Plan	1,405
Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA)	40
Habitats Regulations Assessment (HRA)	8
Equalities Impact Assessment (EQIA)	11

Note: Some respondents to the Main Plan also touched upon issues related to the other three consultations, particularly the SA/SEA

Analysis of Data

6.4 The data for this analysis was collated onto one master spreadsheet and then manually analysed from there.

6.5 To ensure all relevant voices were heard, the consultees were divided into the following key groups:

- Residents and other stakeholders
- Statutory Consultees and Duty to Cooperate Bodies
- Non-Statutory consultees and Interest Groups
- Developers and Landowners

6.6 By grouping consultees, the Council was able to tailor its responses to the specific concerns raised by each group. This approach allowed for a more focused examination of issues, ensuring that technical matters received expert attention while local concerns were addressed in a way that reflected community priorities. Furthermore, it facilitated the identification of common themes and potential conflicts between different groups, enabling the council to balance competing interests effectively.

6.7 The inclusion of tailored responses also ensured that the Castle Point Plan was both technically robust and aligned with community needs.

6.8 A summary of the key issues raised by the different groups are set out in the tables below and include the Council's responses to the issues and how they were used to inform the modifications list.

7. Residents and Other Stakeholders

7.1 Local residents form a crucial group within the consultation process. This includes individuals, and community members who:

- Live in the area affected by the plan.
- Use local services and infrastructure.
- Have a direct interest in housing, transport, and green spaces.

7.2 Local residents were engaged to ensure their views were fully considered and the main issues they raised are considered in the table below.

7.1 Regulation 18 Consultation: Main Issues from 'Residents and Other Stakeholders' and Council Response

These are the main issues from 'Residents and Other Stakeholders' from the Regulation 18 stage consultation which took place between 22 July and 16 September 2024.

Question	Specific Issues Raised	Council Response/Action
Q1. What are your views on the draft Vision for the Castle Point Plan?	Concerns over insufficient infrastructure, especially for roads and healthcare.	Agreed –Development should contribute to improvements in infrastructure provision in the Borough. This has been reflected in the policies of the plan, which will be supported by an Infrastructure Delivery Plan (IDP).
	Opposition to Green Belt (GB) development	This has been taken into account as the spatial strategy prioritises brownfield site redevelopment and regeneration first.
	Concerns about flood risks	Policies in the Castle Point Plan have been informed by a strategic flood risk assessment and seek to avoid and mitigate the risks from flooding.
	Support from some respondents for a focus on community and environmental goals	The Plan will aim to protect, conserve and enhance the natural environment and provide community open space and green infrastructure.
	Others expressed scepticism toward housing targets and cited a need for local considerations over national demands.	The Plan has considered this and aims to balance the need to provide housing and avoiding and where necessary mitigating negative externalities.
Q2. What are your views on the issues that need to be addressed on Canvey Island within the Castle Point Plan?	Top issues include concerns relating to road congestion and flood risk.	The urban first approach reduces the need to travel by concentrating development in existing urban areas, bringing people closer to services and facilities. This optimises land use, supports active and sustainable transport, and makes better use of existing networks. By promoting walking, cycling, and public transport improvements, it creates more accessible, convenient, and sustainable communities while also addressing congestion challenges.

Question	Specific Issues Raised	Council Response/Action
		The concern has been taken account of in transport policies which prioritise public transport, cycling and walking. This will encourage a modal shift from private car to public transport which will reduce road congestion.
	Concerns over healthcare, school capacity, and environmental preservation	The Plan supports the development and improvement of existing health care infrastructure and educational facilities. Developer contributions will be sought to improve these.
	Strong opposition to further development due to overdevelopment and distrust of planning	Comments noted.
	Respondents emphasized the single exit route's congestion and a desire to preserve Canvey's Green Belt.	Policies aim to improve traffic circulation with developer contribution from development. The Plan's strategy is for development within the urban areas and Green Belt protection.
Q3. Do you have any comments on how we should improve access to and through Canvey?	Concerns expressed relating to traffic congestion and need for road infrastructure improvements before development starts.	In response the Castle Point Plan will undertake a feasibility study to identify options for improving access to and from and within Canvey Island, including consideration of any wider strategic implications on and off the Island (Policy C5 – Improved Access to and around Canvey Island).
	Support for a third road access, widening Canvey Way, and improved public transport	The Council is committed to working with key stakeholders in preparing an access to Canvey feasibility study that looks at the potential highway and sustainable mode options for improved access (Policy C5 – Improved Access to and around Canvey Island).
	Public transport and cycling improvements would improve accessibility	New master plans for the town centre and seafront will set out how local access to and between those areas can be improved to reduce the need for the use of the private motor car and improve safe cycling and walking routes.

Question	Specific Issues Raised	Council Response/Action
	Respondent comment: Suggestions for alternative routes, public transit enhancements, and even a ferry were highlighted by several respondents	As above
Q4. What changes or improvements would you like to see in Canvey Town Centre?	Requests for more diverse shops, free parking, and lower rental costs to support local businesses	Regeneration and investment into Canvey Town Centre will be delivered via a new Canvey Town Centre Master Plan. This will identify a new pattern of retail uses appropriate to a town centre, including leisure, community facilities.
	Suggestions for market improvements, better public amenities, and a cleaner environment	The Canvey Town Centre Master Plan will set out the need to maintain, create, and enhance active ground floor frontages that include adaptable floor space.
	others emphasized the need for more family-friendly areas and safety improvements in the town centre environment	Through public realm improvements the Council aim to deliver new public spaces which will allow people to move safely and freely.
Q5: What type of development would you support within the Canvey Town Centre East development cluster?	General support for limited development (affordable housing, retail), but only if infrastructure (roads, drainage) is upgraded.	In order to allow communities to meet their day to day needs the Infrastructure Delivery Plan supports the Castle Point Plan and identifies the infrastructure which will be required to support housing growth in order to allow communities to meet their day-to-day needs.
	Strong calls to retain landmarks like Knightswick Centre, KFC, and War Memorial Hall for community use	<p>The Plan has taken this into consideration.</p> <p>Paragraph 98 (c) of the NPPF requires planning policies and decisions to guard against the unnecessary loss of valued facilities and service.</p> <p>This has been taken into account in Policy Infra1 - Community Facilities. Paragraph 4 of the Policy: Development that would result in the loss of a community facility will only be supported where:</p> <ol style="list-style-type: none"> An assessment has been undertaken which demonstrates that the existing facility is surplus to requirement; or

Question	Specific Issues Raised	Council Response/Action
		b. The existing use will be replaced by equivalent or better provision in terms of quantity and quality either on-site or locally.
	Concerns over flood risks and increased congestion led many to oppose further development without infrastructure improvements.	Site development will be required to provide the necessary road infrastructure and meet the requirements of national planning policy in terms of flood risk.
Q6. What type of development would you support within the Canvey Town Centre West development cluster?	Support for retail and business growth, contingent on infrastructure upgrades, especially a third road - Emphasis on retaining essential services like the library and job centre, with specific mentions of Knightswick Centre and Furtherwick Road - Opposition to New Development: Concerns about overdevelopment and congestion	Policy C1 - Canvey Town Centre, sets out that regeneration and investment into Canvey Town Centre will be delivered via a new Canvey Town Centre Master Plan, which will identify the vision for the town centre, through a collaborative approach with local residents, businesses and partners.
Q7. What type of development would you support within the Long Road development cluster?	Infrastructure First: Strong opposition without upgrades to roads and drainage	Policy C1 - Canvey Town Centre: Regeneration and investment into Canvey Town Centre will be delivered via a new Canvey Town Centre Master Plan, which will include a delivery plan for the phasing of development, risks, and viability (taking account of infrastructure and affordable housing requirements).
	General Opposition: Concerns over congestion, overdevelopment, and flood risk - Preserve Key Services: Calls to retain fire and police stations for community access	Policy C1 - Canvey Town Centre: Additional development sites on other suitable sites. Managing flood risk through greening, water capture schemes and the appropriate use of materials.
	Limited support for mixed-use development if infrastructure improvements are made	A key objective is for development to be supported by the necessary infrastructure as set out in the IDP.

Question	Specific Issues Raised	Council Response/Action
Q8. What types of development could be considered as appropriate within the South & East parts of Canvey Island?	Concerns about overdevelopment, infrastructure, and flood risk	<p>Policy making effective use of urban land and creating sustainable places.</p> <p>Sustainable development a clear focus on making the optimal use of urban land, to maximise the benefits of development for local communities.</p> <p>Supporting a design-led approach to establishing optimal site densities on developable land, which maximises the use of urban land.</p>
	Conditional Residential Development: Some support for limited housing if flood defences and roads are upgraded	Policy requirements deal with mitigating impact of development through enhancements to infrastructure through planning conditions and S.106 agreements.
	Commercial/Retail Support: Some interest in small-scale retail to enhance local services	Comment noted
	- Green Space Protection: Desire to preserve green areas and improve access	Opportunities for greening the town centre and increasing biodiversity at street level and above, including the increased use of renewable energy
Q9. What improvements to the Seafront Entertainment Area would you like to see?	Calls for better parking, cleanliness, and new recreational facilities for families	<p>This issue has been taken into account.</p> <p>Policy Canvey Seafront Entertainment Area:</p> <p>The Council will prepare a master plan for the Canvey Seafront Entertainment area. The Plan will set out a clear vision and objectives for the area, translating those into realistic investment plans to provide new entertainment facilities, improvements to the public realm and</p>

Question	Specific Issues Raised	Council Response/Action
		protection of key features such as the beach areas and historic assets. Development proposals that can be demonstrated to support the tourist industry will be permitted.
	Suggestions for more public amenities, such as picnic areas	Comment noted see above
	some suggested improving walkways and seating along the seafront to attract more visitors	Comment noted see above
Q10. Do you have any comments on Canvey's port infrastructure?	Safety concerns related to the COMAH (Control of Major Accident Hazards) sites	These issue of concern have been taken into account with formulation of Policy C3: Canvey Port Facilities. There must be no unacceptable change in the level of hazard or risk posed by the facility as a consequence of the proposals. The advice of the Health and Safety Executive will be sought in relation to this matter.
	General opposition to expanding port infrastructure due to safety and environmental concerns	Comment noted see above response
	Respondents emphasized the need for strict safety protocols and transparency about potential risks associated with the port.	Comment noted see above response
Q11. What improvements should be made to the South & West Canvey Wildlife Corridor?	Strong support for maintaining the area as a natural habitat, avoiding development	The South Canvey Green Lung will be retained and enhanced as a strategic green infrastructure asset on Canvey Island.
	Suggestions for walking paths, running tracks, and educational areas to make the corridor more accessible	The Council will not support development which would adversely affect its ecological value, and the ability of the area to provide a strategically important ecological corridor.

Question	Specific Issues Raised	Council Response/Action
	Interest in adding benches, waste bins, and toilets to improve visitor experience	Comment noted. Biodiversity net gain or through long term schemes such as Countryside Stewardship would be encouraged.
	Emphasis on enhancing biodiversity and managing flood risks	The South Canvey Green Lung will be retained and enhanced as a strategic green infrastructure asset on Canvey Island.
Q12. What approach to development in the West Canvey Employment Area (Charfleets Industrial Estate and the Canvey Retail Park) would you support?	Support for attracting businesses and creating well-paying jobs	Comment noted Support for attracting businesses and creating well-paying jobs is a key objective of the plan.
	Preference for minimal expansion unless infrastructure improves, desire for more shops and leisure facilities Emphasis on road maintenance and access upgrades before further development.	Policy - West Canvey (C4) A master planned approach to the regeneration and renewal of west Canvey as identified on the policies map will be taken to optimise urban land use and improve the quality of the urban environment and public realm. The master plan will deliver: A land use strategy that identifies how a mix of uses comprising residential, community, commercial and industrial can be accommodated across this area whilst ensuring residential amenity and avoiding harm to economic activity.
Q13. Do you have any views about the potential Site Allocations in Canvey?	Predominantly opposed to further development due to flood risk and limited infrastructure Conditional support for specific, low-density sites only	Small scale urban sites, as identified through the Strategic Land Availability Assessment are proposed to meet housing need. They are subject to compliance with

Question	Specific Issues Raised	Council Response/Action
	Calls to protect specific areas, such as St Agnes Drive garages.	all relevant policies in this plan depending upon locational characteristics.
Q14. What are your views on the issues that need to be addressed in Benfleet within the Local Plan?	Concerns about road congestion, green space preservation, and impacts on public services	Comment noted. Policies developed to meet these concerns.
	Calls for balanced development that prioritizes existing infrastructure needs	Noted - Development will be required to be supported by necessary infrastructure.
Q15. What changes or improvements would you like to see in South Benfleet Local Centre?	Support for aesthetic upgrades, waste management, and parking improvements	The focus of redevelopment here should be on creating a more pleasant environment, greater use diversity, with a range of uses that extend into the evening to create a safer and more welcoming place.
	Some opposition to expanding commercial spaces	Comment noted
Q16. What type of development would you support within the South Benfleet development cluster?	Opposition to dense development; preference for low-rise housing if necessary	This plan supports the NPPF's objective of contributing to the achievement of sustainable development with a clear focus on making the optimal use of urban land (Policy SP2), to maximise the benefits of development for local communities.
	Emphasis on protecting green areas and maintaining current infrastructure	Development will be required to provide open space and associated green infrastructure.
Q17. What type of development would you support within the Benfleet Station development cluster?	Concerns about preserving commuter parking and infrastructure for local transit.	Comments noted.
	Mixed support for affordable housing, with suggestions to limit high-density projects	Density depends upon location of sites and impact on character. Assessed under other DM and design policies proposed in the Plan.

Question	Specific Issues Raised	Council Response/Action
		All sites of more than 10 dwellings are expected to provide affordable housing.
Q18. What approach should be taken to development in and around the South Benfleet Conservation Area?	Opposition to development to preserve historical character	The aim of policy is to protect the character of existing designated conservation areas. New development is required to respect character (Policy: D9 - Conserving and Enhancing the Historic Environment).
Q19. What changes or improvements would you like to see in Tarpots Local Centre?	Requests for more parking, increased shop variety, and improved safety	<p>Policy B2 Tarpots Town Centre</p> <p>Proposals for regeneration, redevelopment and renewal of premises and spaces in Tarpots Town Centre will be supported where they would:</p> <p>contributes to the vitality of the town centre and create a pleasant, accessible and safe environment</p> <p>Transport Improvements focusing on enhancing walking and cycling connections to the centre from surrounding areas; and</p> <p>Improvements to the pedestrian public realm in the centre.</p>
	Concerns about anti-social behaviour and need for police presence	Policy aims to design out crime and anti-social behaviour (Policy D1 – Design Objectives), ensures opportunities to design out crime are taken.
Q20. What type of development would you support within	Opposition to new development due to existing congestion	Residential development could also bring benefits in the form of new infrastructure and measure to resolve physical problems.

Question	Specific Issues Raised	Council Response/Action
the Tarpots development cluster?	Some support for limited residential and commercial development with parking improvements	Noted -the strategy focus is on small scale sites in built-up areas.
Q21. What types of development could be considered as appropriate within the Manor Trading Estate?	Support for relocating industrial area and repurposing for housing Mixed views on maintaining it as a commercial hub Calls for road improvements if redeveloped	<p>In response a Policy has been developed for the Manor Trading Estate (Policy B8). A master planned approach to the regeneration and renewal of Manor Trading Estate will be taken to optimise urban land use while ensuring residential amenity and avoiding harm to economic activity.</p> <p>Improved public realm which creates space for pedestrians and cyclists.</p> <p>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 10%.</p> <p>New development of around 200 homes with open space provision to the north.</p>
Q22. What opportunities for improvements and development within the A13 corridor in Benfleet are there?	Support for targeted development along corridor, including housing Concerns about traffic congestion and overcrowding Suggestions for environmental improvements, like tree planting	<p>In response to this, the plan proposes urban site allocations under policies for suitable, available and deliverable for housing. They will contribute towards optimising urban land use by making effective use of vacant and underused land in the existing urban area.</p> <p>Site planning will require parking arrangements and for vehicular accessibility, environmental improvements and landscaping.</p>
Q23.	Suggestions for maintenance, cleanliness, and adding outdoor facilities.	In response Policy B9 – South Benfleet Playing Fields has been formulated.

Question	Specific Issues Raised	Council Response/Action
What improvements should be made to the South Benfleet Playing Fields area?	Support for keeping it as a recreational green space.	<p>Retain as a multifunctional green space which will deliver the following:</p> <p>An enhance recreational role, with the pavilion redeveloped.</p> <p>Improved walking and cycling connectivity between residential areas in South Benfleet and the railway station;</p> <p>Enhanced biodiversity across the site, with wildlife corridors between areas of nature conservation to the east and west.</p>
Q24. Do you have any views about the potential Site Allocations in Benfleet?	Support/opposition to new site allocations	Sites in policies have been identified through the Strategic Land Availability Assessment as being the most suitable, available and deliverable for housing. They will contribute towards optimising urban land and providing affordable housing to meet local need.
	Limited support for planned housing without infrastructure upgrades	Proposes new housing will need to meet requirements for infrastructure as set out in the relevant policy and under other policies of the plan.
	Strong concerns over specific sites like Jotmans Farm & GB7. Opposition due to Green Belt and flood risks.	<p>Sites GB5 (Land west of Benfleet, or (Jotmans Farm)), and GB7 (Boyce Hill Golf Course) are not proposed for allocation.</p> <p>Sites allocated in policies have been identified through the Strategic Land Availability Assessment as being the most suitable and sustainable in order to meet housing need including affordable housing.</p>

Question	Specific Issues Raised	Council Response/Action
		The CPP adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs before considering Green Belt land.
Q25. What are your views on the issues that need to be addressed in Hadleigh within the Local Plan?	Concerns about preserving historical and cultural heritage	The Plan has taken this into consideration. Policy D9 - Conserving and Enhancing the Historic Environment - Development proposals affecting a heritage asset (either designated or non-designated) will be expected to conserve, and where appropriate enhance, the setting of the heritage asset.
	Opposition to further housing development	The Strategic Land Availability Assessment identifies developable urban sites in sustainable locations in Hadleigh which will contribute to identified housing need, including affordable housing to meet local needs.
	Calls for infrastructure improvements, especially traffic and parking.	Development will be required to be supported by necessary infrastructure
Q26. How should the management of Benfleet and Southend Marshes be approached in the Plan?	Concerns about overdevelopment near marshes Strong support for protection and conservation of marshes	Benfleet and Southend Marshes Site of Special Scientific Interest (SSSI) covers an extensive area of the marshland. Policy Had2 – Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes will protect and support proposals for habitat creation and habitat management and mitigation.
	Balanced management approach for public access and education	Comment noted also see above
Q27. What improvements should be made to the Hadleigh Castle Country Park area?	Suggestions for better parking and access Calls for regular maintenance and new facilities Desire to preserve the natural environment	The comments have been taken forward in Policy Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes (Had2)

Question	Specific Issues Raised	Council Response/Action
		Support development proposals related to the improvement of recreational facilities within the Country Park where they do not have a significant impact on the landscape and meet requirements of other relevant policies of the Plan.
Q28. What changes or improvements would you like to see in Hadleigh Town Centre?	Opposition to further development, particularly of flats	The Local Housing Needs Assessment evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, is delivered, to meet the housing needs.
	Support for traffic improvements and better road layout	This has been carried forward in Policy: Had1 – Hadleigh Town Centre. The Masterplan will identify: Adaptations to the existing highway network that improve the quality of the public realm and contribute to improved pedestrian and cycling access. A car parking strategy that provides the level of car parking required to meet demand.
	Desire for more diverse shops and improved public spaces	Carried forward by Policy (Had1) for Regeneration and investment into Hadleigh Town Centre which will be delivered via a new Hadleigh Town Centre Master Plan. It will identify: A new pattern of retail and uses appropriate to a town centre, including leisure, community facilities, residential, employment and cultural uses. Improve the quality of the public realm, and pedestrian and cycling access.

Question	Specific Issues Raised	Council Response/Action
Q29. What type of development would you support within the Hadleigh Central development cluster?	<p>Opposition to further development in Hadleigh Central</p> <p>Limited support for low-rise and community-friendly projects</p> <p>Preference for mixed-use development with housing and businesses: conditional support for development in sites 302-305</p>	<p>Comments taken into account by Policy Had1 for Regeneration and investment into Hadleigh Town Centre which will be delivered via a new Hadleigh Town Centre Master Plan.</p> <p>Policy initiative recognizes the considerable scope to redevelop the entire area to better provide the community uses, provide new opportunities for ground floor commercial activities, to provide new homes and to substantially improve the area.</p>
Q30. What type of development would you support within the Vic House Corner Roundabout development cluster?	<p>Opposition to major development due to traffic concerns. Calls for traffic flow improvements over new development</p>	<p>Policy Had1 – Hadleigh Town Centre Regeneration and investment into Hadleigh Town Centre will be delivered via a new Hadleigh Town Centre Master Plan.</p> <p>Sites allocated for development will be incorporated into the town centre renewal to deliver new homes and commercial floorspace.</p>
	<p>This development cluster should be developed for a variety of uses, including town centre uses and residential</p>	<p>See as above</p>
	<p>Support for small-scale mixed-use or commercial development</p>	<p>See as above</p> <p>Support for more mixed use development incorporating compatible housing and commercial uses is noted.</p>
Q31. What type of development would you support within	Strong opposition to new housing due to existing strain on infrastructure	The Castle Point Plan will be supported by an Infrastructure Delivery Plan which will set out the

Question	Specific Issues Raised	Council Response/Action
the Hadleigh East development cluster?		infrastructure required to support development and who will provide it.
	Support for affordable housing if infrastructure is improved	See above
	Preference for mixed-use projects with residential and commercial spaces	Noted
	This is an important area of employment and features - only uses that support the existing uses should be proposed	Support for compatible development uses is noted.
Q32. What opportunities for improvements and development within the A13 corridor in Hadleigh are there?	Support for widening A13 and improving traffic flow	<p>Comments taken into account by Policy T2 - Highway Improvements</p> <p>Essex Local Transport Plan prioritises improving journey time reliability on strategic inter-urban routes including the A13, providing for and promoting access by sustainable modes of travel to new development areas.</p>
	Opposition to overdevelopment along corridor	Where necessary, the Council will secure highway works (S278) and/or financial contributions (S106) to deliver highway projects necessary to accommodate the growth arising from this plan.
	Interest in commercial development with green improvements	<p>Regeneration and investment into Hadleigh Town Centre will be delivered via a new Hadleigh Town Centre Master Plan.</p> <p>Opportunities for greening the town centre and increasing biodiversity at street level and above.</p>

Question	Specific Issues Raised	Council Response/Action
Q33. Do you have any views about the potential Site Allocations in Hadleigh?	Potential sites are not adequate to support the current and future housing needs for the community	The approach in the plan to meeting development needs focuses on urban renewal and regeneration, seeking to identify development sites in sustainable locations which make the best use of brownfield land taking into account the constrained nature of the borough.
	General Opposition: Strong concerns over flood risks, overdevelopment, and inadequate infrastructure. - Site-Specific Comments: Fairview Crescent: Concerns over traffic congestion. Near Hadleigh Castle: Desire to protect cultural heritage. Salvation Army Fields: Preference to preserve as community space	<p>The Plan has taken this into consideration.</p> <p>Policy D9 - Conserving and Enhancing the Historic Environment - Development proposals affecting a heritage asset (either designated or non-designated) will be expected to conserve, and where appropriate enhance, the setting of the heritage asset.</p> <p>Where necessary, the Council will seek contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms.</p> <p>The Plan will seek to ensure neighbourhoods are supported by services and facilities which meet the needs of different groups.</p>
	Conditional Support: Limited, low-density development only if infrastructure improves.	The Local Housing Needs Assessment evidences a need for different sizes, types and tenure of accommodation. The Plan will seek to ensure that a wide choice of housing sizes, types and tenures, is delivered, to meet the housing needs. This will also need to be supported by necessary infrastructure to meet community needs.

Question	Specific Issues Raised	Council Response/Action
Q34. What are your views on the issues that need to be addressed in Daws Heath within the Castle Point Plan?	Strong support for protecting Green Belt land.	A key objective of the Plan is to protect the Green Belt.
	Concerns about road congestion and infrastructure strain.	This concern has been taken account of in transport policies which prioritise public transport, cycling and walking. This will encourage a modal shift from private car to public transport which will reduce road congestion. The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development.
	Requests for more healthcare and recreational facilities.	Contributions will be sought from new development to provide social and community facilities including open space and health care and education. Policy SP4 Development Contributions - Where necessary, the Council will seek contributions towards the provision of infrastructure required to make a development proposal acceptable in planning. (see policies Infra1 – Infra6).
	Desire to protect wildlife habitats and natural character.	The Plan will aim to protect, conserve and enhance the natural environment. Detailed policies have been formulated to ensure that development will not cause harm to local sites of importance for wildlife, biodiversity and geology. (ENV1 – ENV5)
Q35. Do you have any views about the potential Site Allocations in Daws Heath?	Strong opposition to site allocations in Daws Heath, with emphasis on preserving woodlands and Green Belt	The Green Belt is tightly defined around Daws Heath and there are very limited opportunities for development. This has been recognized in the Plan.

Question	Specific Issues Raised	Council Response/Action
		Policy DH1: Green Space Connectivity in Daws Heath. The green space around Daws Heath will be protected and enhanced with natural greenspace and green infrastructure resource.
	Concerns about the impact of new development on local infrastructure, especially roads	The Plan does not propose allocation in Daws Heath.
	Some conditional support for small-scale, low-density housing if environmental impacts are minimized	Comments noted see above responses
Q36. What are your views on the issues that need to be addressed in Thundersley within the Local Plan?	Concerns over infrastructure, particularly traffic congestion and road quality	Development should contribute to improvements in infrastructure provision in the Borough. This has been reflected in the policies of the plan, which will be supported by an Infrastructure Delivery Plan.
	Limited support for small-scale development if infrastructure is improved first	Comment noted see above. The Plan has considered this and aims to balance the need to provide housing and avoiding and where necessary mitigating negative externalities.
	Calls to preserve green spaces and maintain the rural character of Thundersley	This issue has been considered in Policy Thun4 Green Space Connectivity in Thundersley. Existing public open spaces will be protected. Opportunities to address the lack of access to, and quantity of, different types of open space will be supported in the area.
Q37. What type of development would you support within	Strong opposition to development, with many wanting the area left unchanged.	A policy has been developed for the site at Kiln Road Campus (Thun2).

Question	Specific Issues Raised	Council Response/Action
the Kiln Road development cluster?		<p>This site will be brought forward through master planned redevelopment to create improved community facilities, a new local shopping parade and 617 new homes for the benefit of the community.</p> <p>The current Council offices, Seevic College, Runnymede Leisure Centre and Runnymede Hall all have the potential to operate on a more efficient building footprint, creating the opportunity to release land for new development.</p>
	Conditional support for housing or mixed-use projects, with green space preservation.	The redevelopment will be integrated with adjacent public open space.
	Concerns over traffic and infrastructure, needing upgrades before any development	New access to the site will be secured and managed with new car parking to optimise land use effectively.
	Site-specific: Emphasis on retaining facilities at USP College, Council Offices, and Runnymede Leisure Centre for community use.	The community uses currently on the site will be relocated either on site or off site through a clear phasing plan.
Q38. What opportunities for improvements and development within the A13 corridor in Thundersley are there?	Support for beautifying the corridor with green spaces	<p>Comment noted</p> <p>A key objective of the Plan is to support the enhancement of the borough's green spaces and blue infrastructure for the benefit of wildlife, biodiversity, landscape.</p>
	Concerns about traffic congestion, needing road improvements	<p>The Transport Assessment for the plan has identified the need for transport improvements to support development.</p> <p>These are set out in the Infrastructure Delivery Plan.</p>

Question	Specific Issues Raised	Council Response/Action
	Conditional support for limited housing and commercial development if infrastructure is upgraded	The Plan allocates site for development in Thundersley. This will also need to be supported by necessary infrastructure to meet community needs.
	Site-specific: Interest in improving Kenneth Road Junction and selective development on plots 401 and 402	The Transport Assessment for this plan has identified the need for possible improvements to the A13/ Kenneth Road junction.
Q39. What types of development could be considered as appropriate within the Rayleigh Weir retail park and Stadium Way employment area?	Support for mixed-use development with retail, housing, and offices Interest in expanding commercial spaces and adding leisure facilities (gyms, entertainment) Concerns about potential overcrowding and traffic impacts	The Council acknowledges that the Rayleigh Weir Retail Parks plays an important role in meeting the retail needs of the Borough. They provide employment and support a supply chain network. The regeneration of Retail Parks is supported where it makes more intensive use of the site, subject to compliance with other policies of the Plan.
Q40. Do you have any views about the potential Site Allocations in Thundersley?	Predominant opposition to new site allocations due to overdevelopment and infrastructure concerns Conditional support for limited development if green spaces and infrastructure are prioritized concerns for Rayleigh Road, Dark Lane, and Hart Road, with strong preference for Green Belt preservation	The sites identified for allocation have been identified through the Strategic Land Availability Assessment as being suitable, available and deliverable for housing. They will contribute towards optimising urban land use by making effective use of vacant and underused land in the existing urban area. They will also provide much needed affordable housing to meet local need identified.
Q41 What do you think the Castle Point Plan housing requirement need figure should be? Please select your preferred choice from the options below.	Most of the respondents to the question thought that housing requirement should be based upon the urban capacity that exists to accommodate.	Comment noted The strategy takes into account existing capacity.

Question	Specific Issues Raised	Council Response/Action
Q42. Please rank the following options in your order of preference for delivering the housing growth we need.	Most respondents favoured the option (1a) of limiting development to the urban areas in order to deliver the housing need. This was followed by option (1b) of the regeneration of designated employment areas.	Comment noted The strategic approach to meeting development needs focuses on urban renewal and regeneration, seeking to identify development sites in sustainable locations which make the best use of brownfield land.
Q43. Do you have any comments on the implications of the Options above?	Concerns over infrastructure strain with housing growth. Strong opposition to Green Belt development; preference for brownfield sites. Protect Green Belt, Salvation Army Land; limited support for NW Thundersley (GB16); Manor Trading Estate preferred for development; visual impact concerns near Hadleigh Castle	See response above in relation to preferred option. The Plan seeks to protect the Green Belt.
Q44. Do you have another preferred option, which may include a combination of the above, or alternative land sources?	There is strong support for prioritizing brownfield sites over the development of Green Belt land.	The strategic focus is on sustainable locations which make the best use of brownfield land.
Q45. What do you think about the sources of urban land identified, and how should they be managed if redeveloped?	Strong support for retaining essential services on-site or within the borough to avoid loss of local amenities. Concerns about the potential loss of critical services, including healthcare and retail, if land is redeveloped Calls for balanced development with infrastructure improvements to support increased demand	The Policy objective is to improve infrastructure provision and protect community facilities. Policy Infra1 - Community Facilities - Proposals for new, or extensions or alterations of existing community facilities should: Respond to the needs of the local community.

Question	Specific Issues Raised	Council Response/Action
Q46. What types of development could be considered as appropriate within the North West of Thundersley area?	Strong opposition to large-scale development, with most preferring minimal or no development	This plan supports the NPPF's objective of contributing to the achievement of sustainable development with a clear focus on making the optimal use of urban land, to maximise the benefits of development for local communities.
	Support for low-density housing or mixed-use development, prioritizing green space	Policy Thun4 Green Space Connectivity in Thundersley. The green spaces around Thundersley will be protected and enhanced as a green infrastructure resource of landscape, ecological and heritage value.
	Concerns about infrastructure limitations and traffic impacts	Development will be required to be supported by necessary physical, social and community infrastructure as required by the Infrastructure Delivery Plan.
	Concerns about traffic impacts on Fairglen Interchange;	The Council will support the local Highways and Transportation Authority in securing improvements to the A13, A127 and A130, and associated junctions including the A127/A130 Fairglen Interchange (short and long term) (Policy T2 – Highway Improvements).
	Relocate Manor Trading Estate to free up housing land;	This issue has been considered and Policy B8 – Manor Trading Estate A master planned approach to the regeneration and renewal of Manor Trading Estate will be taken to optimise urban land use and improve the quality of the urban environment and public realm. The master plan will deliver new housing.

Question	Specific Issues Raised	Council Response/Action
	Protect Benfleet Football Club and Woodside Park from development impacts	Policy Infra1 - Community Facilities: The redevelopment of existing community uses will be supported if the utility and function of the community use is improved.
Q47. Please rank the following outcome options in your order of preference to show what you feel should be delivered alongside new housing in the Plan	Strong preference for delivery of new community infrastructure within new development.	The Infrastructure Delivery Plan has a regularly updated schedule of infrastructure improvements that are planned across the borough, including cost estimates and progress updates.
Q48. Are there any other priorities not listed above which you feel should be delivered alongside new housing in the plan?	Emphasis on infrastructure improvements (roads, schools, healthcare) Requests for community and recreational facilities Protection and addition of green spaces Support for enhanced public transport	Comments noted see above
Q49. What benefits could justify increased density in new development in the borough?	Increased density could be acceptable if it delivers more infrastructure and affordable housing.	This has been recognised in the plan. Increasing residential density in sustainable locations is essential to supporting the Borough's town centres and protecting green spaces. Higher density, including co-locating mixed uses on sites helps to create shorter trips for

Question	Specific Issues Raised	Council Response/Action
		residents to services, and thereby reducing the need to travel.
Q50. Are there any other benefits that you think it would be appropriate for higher density development to deliver?	Biodiversity net gain, open space provision Revitalizing Town Centres: Potential for higher density to increase activity in town centres and benefit local businesses Improved Public Services: Calls for enhanced security, public services, and infrastructure to support denser areas	All these benefits have been recognized in the Plan re: Policy SP2 - Making Effective Use of Urban Land and Creating Sustainable Places.
	Opposition: Some respondents expressed concerns about overcrowding and infrastructure strain	This will be taken into account when assessing development proposals. The negative effects of higher densities are also recognised. All new development should complement its neighbourhood and fit in with the character of an area. Sites should open up routes across and between neighbourhoods and contribute to making the borough as a whole easier to get around.
Q51. Which type of affordable housing product do you want to see prioritised?	There is a need for a variety of affordable housing types. The majority of the respondents (111) considered that a provision of 69 affordable homes p.a from all types to be just right.	Comment noted
Q52. Do you think there should be a different split of housing unit sizes than identified in the Local Housing Needs	- In terms of the requirement of housing development to provide 34% of market dwellings as 4-bedrooms a large majority of the respondents (171) see this as being too high - The mix provided will vary from site to site and area to area. Policy should have regard to it but be	Agreed. This has been taken into consideration under Policy Hou3 Housing Type and Mix. To ensure mixed and balanced communities development will be expected to reflect a mix in line with Policy Hou3 (Housing Type and Mix) as far as possible and as an initial benchmark. However, it is recognised

Question	Specific Issues Raised	Council Response/Action
Assessment for market housing?	flexible and not require full adherence to the proposed mix in all circumstances.	that strict application of the mix may not be appropriate in all cases.
Q53. Do you think there should be a different split of housing unit sizes than identified in the Local Housing Needs Assessment for affordable housing?	Large number of respondents to the question (155) consider that the requirement for affordable housing to provide the new dwellings as 4-bedroomed should be lower than 12%.	Comment noted as above
Q54. What proportion of new housing stock should be built to enhanced accessibility standards?	Detailed local evidence is required to justify the final proportion. Requirement to meet Part M4(2) no longer necessary as it will now be met through the Building Regulations.	Agreed, but is included until mandated in the Building Regulations.
	Older people's housing should be incorporated into the emerging Local Plan separately to adaptable and accessible housing and not confused with it.	Policy Hou4: Specialist Housing Requirements addresses older people's housing needs.
	Blanket 8% M4(3) target is ambiguous and should be amended to clarify what is required	The 8.1% requirement for enhanced accessibility standards was identified by the evidence in the Local Housing Need Assessment, December 2023.
Q55. How do you feel about the supply of Caravan & Park Homes in the borough?	Support for limited and controlled supply to prevent overcrowding	This has been considered in Policy on new Park Homes (Hou5). New park homes will only be supported on existing Park Home sites.

Question	Specific Issues Raised	Council Response/Action
	Concerns about potential overdevelopment and impact on green spaces	Impact will be considered when an application is made. Proposals with adverse impacts will not be permitted.
	Some support for more park homes, especially for retirees, as affordable housing options	<p>This has been considered and taken into account in Policy Hou5 on New Park Homes.</p> <p>The contribution of existing sites in the provision of low cost housing is recognised. However, the construction of these homes is more vulnerable to cold weather and flooding than more traditional buildings.</p> <p>The Council will seek to limit the further provision of park homes to the existing caravan sites, and where possible and necessary will restrict new homes.</p>
Q56. How do you feel about the provision of specialist housing (i.e., homes for older people)?	Strong support for more specialist housing options, including retirement homes and bungalows	This has been taken forward in Policy: Specialist Housing Requirements (Hou4). Subject to compliance with all other relevant policies of this plan, the Council will support proposals that contribute towards the delivery of 1,056 retirement/sheltered homes and 594 extra care units for older people over the plan period as identified in the Essex Supported and Specialist Housing Needs Assessment 2025.
	Concerns about insufficient current provision for elderly needs	Comment noted see above response
	Interest in mixed-use developments combining retirement living with care services	<p>Comment noted</p> <p>The Plan will seek to optimise high quality living environments that provide for the full range of identified housing needs.</p>

Question	Specific Issues Raised	Council Response/Action
Q.57 How much of a priority do you consider the provision of care homes to have?	Residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities should be encouraged.	The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations in accordance with Policy Hou4 on Specialist Housing Requirements.
Q58. How should we meet the needs for new Gypsy & Traveller homes?	Opposition to new sites, citing existing provision as adequate. Suggestions to integrate Gypsy & Traveller housing into general housing policies. Conditional support with clear guidelines and community input.	Gypsy and traveller sites will be located in accordance with national policies and guidance and the Accommodation Assessment (GTAA). The issue has been considered under Policy for Gypsy and Traveller Provision. The Council will meet the need for 18 Gypsy and Traveller pitches over the plan period through the intensification of pitch provision at Orchard Place and Janda Fields and will protect existing pitches.
Q59. Do you have any comments on the continued safeguarding of the Council's three principal employment areas for employment?	Concerns over poor road conditions and accessibility, especially at Manor Trading Estate and Stadium Way.	The policy approach in the Plan is to prepare master plans for these sites to regenerate and optimise urban land use and improve the quality of the urban environment and public realm.
	Suggestions for partial repurposing to housing or offices to reduce heavy vehicle congestion	This issue has been taken into consideration. Whilst the Council does not wish to lose employment provision, the surplus of employment land combined with the poor quality of the existing employment areas provides an opportunity to secure mixed use renewal of the sites to provide both new homes and better-quality employment and commercial floor space.

Question	Specific Issues Raised	Council Response/Action
	Interest in sustainability efforts like rooftop solar power and urban farming	<p>This has been considered Policy SD4 – Net Zero Carbon Development.</p> <p>All new development should seek to minimise its impact on climate change as the United Kingdom pursues a Net Zero future.</p>
	Calls for better road links to main highways to ease traffic	See above on master plans to improve the public realm and physical environment.
	Support for maintaining employment, especially at Charfleets Industrial Estate	<p>Agreed, see Policy E1 on Development on Strategic Employment Land.</p> <p>The continued operation and growth of developments falling within use class B, and other compatible uses on allocated Strategic Employment land such as at Charfleets Industrial Estate will be supported and maintained.</p>
Q60. What additional uses should be introduced to help improve the operation of the borough's employment sites?	Suggestions for shops, business units, and office spaces. Improved roads, parking, public transport and green spaces.	<p>Policy has been developed to deal with Development on Strategic Employment sites:</p> <p>Class B development will be supported which:</p> <ul style="list-style-type: none"> Increases employment floorspace; Increases the number of jobs, particularly within high-value, skilled sectors; Diversifies the range of sizes of employment spaces within the allocation; Creates environmental improvements such as to the quality of open spaces, landscaping, roads, drains, and communication infrastructure; Improves access by all modes;

Question	Specific Issues Raised	Council Response/Action
		<p>Class E development will also be supported.</p> <p>Establishing skills training centres</p> <p>The Plan supports this and will be delivered through: Policy E3 - Development of Local Skills</p> <p>Major developments to be supported by education and skills plans that demonstrate how local training and employment opportunities will be delivered.</p>
Q61. How much protection do you feel un-designated smaller employment sites should be given?	Support full protection for smaller employment sites to preserve local jobs and economic stability.	Development that results in the potential net loss of employment floorspace or jobs particularly within town centres will be refused.
	Minor suggestions for repurposing unused sites.	Balance needs to be struck between residential development and protection of employment opportunities. Redevelopment would depend on an assessment of impacts and benefits of the particular case.
Q62. Do you think that new development should be designed to support working from home?	Some see hybrid work as essential, but others worry WFH causes “social isolation” and affects mental health.	Comment noted
	Some feel WFH should be a “personal choice” rather than encouraged by council, noting a trend back to office work.	Comment noted
	Keeping workers local is seen as beneficial for nearby businesses.	Reducing the need to travel is a key element of the Castle Point Plan. This will be fully supported through land use policies that aim to increase mixed land uses and sustainable modes of transport.

Question	Specific Issues Raised	Council Response/Action
Q63. Do you think new facilities that aid working near home should be supported?	Strong support for facilities close to home to reduce commute time, pollution, and improve work-life balance and mental health.	This has been taken into account in the overall strategy. Policy SP2 - Making Effective Use of Urban Land and Creating Sustainable Places: Supporting mixed use developments in appropriate locations which offer the opportunities to co-locate homes, jobs, and services.
	Some felt demand might not justify new facilities, citing space constraints and low anticipated usage.	Comment is noted see above
	Some suggested focusing on digital infrastructure rather than physical spaces.	The provision of improved Digital infrastructure is an objective of the Plan. Policy Infra6 - Communications Infrastructure - All new homes will be required to connect wherever possible to super-fast broadband.
Q64. How can the Castle Point Plan help to support the tourist economy of the borough?	Calls for improved infrastructure (transport, signage, upkeep).	The Infrastructure Delivery Plan lists the type of infrastructure needed in the borough, potential costs and timeframes for delivery. These include improvements and expansions, footways, cycleways, bridleways, highways, and signage. The Essex Local Transport Plan considers actions to improve access for cyclists and pedestrians in particular and identifies improving signage as essential.
	Need for more hotels and holiday accommodation.	This has been considered in Policy E4 – Culture and Tourism

Question	Specific Issues Raised	Council Response/Action
		<p>Development that can be demonstrated to support sustainable growth in the cultural and tourism sectors within the borough will be supported, subject to compliance with all other relevant policies in this plan.</p> <p>The loss of use and facilities that make a strong contribution to the culture or tourist economy will be resisted.</p>
	<p>Desire to protect and enhance green spaces for community and tourism</p>	<p>Policy SP1 – Supporting Enhancement of the Borough’s Green Spaces</p> <p>The Council will support the enhancement of the borough’s green spaces and blue infrastructure for the benefit of wildlife, biodiversity, landscape, amenity, climate resilience and to support the health, wellbeing and enjoyment of them by residents and visitors.</p>
	<p>Suggestions for increased promotion of local attractions (e.g., Hadleigh Castle, Canvey Island).</p>	<p>Objective of policies is to develop destinations and attractions which are safe, secure and accessible.</p> <p>Policy: C2 Canvey Seafront Entertainment Area, commercial and leisure development proposals that can be demonstrated to support the tourist industry will be permitted.</p> <p>Policy E4 – Culture and Tourism supports sustainable growth in the cultural and tourism sectors within the Borough. The loss of, or harm to, facilities and uses that make a strong contribution to the cultural or tourist sectors will, however, not be supported.</p>

Question	Specific Issues Raised	Council Response/Action
	Requests for better parking options and accessibility.	This is considered under Policy T7 - Parking Provision where proposals for development will be expected to make provision for safe and secure car parking, parking for people with disabilities and parking for bicycles, having regard to the Essex Vehicle Parking Standards. All new development will be expected to provide electric vehicle standards as set out in the EPOA Parking Guidance.
	Interest in adding recreational facilities like boat ramps	The Council recognises the potential of improving the leisure and recreational facilities in the Borough.
Q65. How can the plan support the development of skills within the borough's workforce?	Strong calls for increased access to local training facilities, more diverse college courses, and emphasis on vocational skills.	This has been taken forward and the plan contains a policy: Development of Local Skills (E3).
	Support for apprenticeships and partnerships with local businesses to foster job opportunities	To ensure that this plan contributes towards improvements in economic productivity it requires major developments to be supported by education and skills plans that demonstrate how local training and employment opportunities will be delivered by the development. These will be secured as part of the s.106 agreement contributions towards education and skills.
	Some respondents suggested career fairs and local initiatives for school leavers to promote employment pathways.	Support for the development of post 16 education and skills training infrastructure.
Q66. Would you support the development of a new facility to help improve local skills, and the ability of residents to improve their	Support for a skills development facility to enhance employment opportunities for local residents.	Comment noted see above
	Concerns about protecting Green Belt land, with preferences for using brownfield sites for development	The spatial strategy gives preference to the redevelopment of brownfield land.

Question	Specific Issues Raised	Council Response/Action
opportunities to find work locally?		
	Some suggestions for maximizing existing facilities to reduce environmental impact	Proposals will be considered on their merit taking into account environmental impacts.
Q67. Are there any changes you would propose to the borough's network of centres?	Strong suggestions for regeneration in Hadleigh, emphasizing upgrades in public spaces and limiting flat development.	Policy Had1 Hadleigh Town Centre Regeneration and investment into Hadleigh Town Centre will be delivered via a new Hadleigh Town Centre Master Plan. In terms of flats this depends on the local context and viability. It is recognised that some sites may be suitable for flats developments, whilst others will provide more houses and bungalows. Consideration will be made on an individual site basis.
	Some calls for pedestrian-friendly areas and better retail diversity in local centres.	See earlier responses relating to area based policies for town centres.
	A few respondents felt no changes were necessary, while others supported more focus on independent businesses and local amenities	See earlier responses relating to area based policies for town centres.
Q68. How important is the safeguarding of retail floorspace within the heart of local centres to you?	Majority expressed that safeguarding retail floorspace is very important to maintain local shopping options and support small businesses.	This issue has been considered in Policy TC1 on town Centres: The Primary Shopping Area is the main concentration of retail uses. Loss of ground floor active retail/service frontages will be resisted.

Question	Specific Issues Raised	Council Response/Action
	Concerns raised about oversupply in some areas, leading to vacant retail spaces.	Vacancy rates in Castle Point's retail centres are generally low compared to national averages. Nonetheless the Council recognises the role of town centres are changing and will produce master plans for the main town centres to address challenges around the need to diversify the retail offer, attract more leisure, deliver town centre living and improve the environmental quality.
	Some respondents suggested balancing retail needs with other uses, such as community or leisure spaces, to enhance vitality in town centres	Comment noted see above
Q69. Do you have any improvements that you would like to see in your local centre or shopping parade?	Strong support for enhancing Hadleigh, particularly with a Market Square, new library, and community spaces.	Carried forward by Policy Had1 for Regeneration and investment into Hadleigh Town Centre which will be delivered via a new Hadleigh Town Centre Master Plan. It will identify: A new pattern of retail and uses appropriate to a town centre, including leisure, community facilities, residential, employment and cultural uses. Improve the quality of the public realm, and pedestrian and cycling access.
	Calls for more independent shops and cafés to improve variety and community feel.	This is addressed in Policy TC1 - Town Centres Within the town centre but outside the primary shopping area, there will be support for development that creates a wide range of town centre uses, increases activity within the centre, and supports the evening economy.

Question	Specific Issues Raised	Council Response/Action
	Some respondents felt no changes were necessary, while others emphasized cleanliness and better public space management	Development that enhances town centres for visitors will be supported.
Q70. Do you support greater protection for individual shops outside of local centres and parades?	Strong support for protecting individual shops, especially local businesses and corner stores that serve community needs.	In response to this Policy TC4 - Protecting Local Shops has been introduced which aims to protect individual convenience retail shops more than 800m from a town centre or local shopping parades.
	Calls for conditional support based on each shop's viability and contribution to the community	Comment noted see above response
	Some concerns about the appearance and upkeep of certain shop types, such as fast-food takeaways	A key objective of the Plan is to achieve environmental improvements.
Q71. What should the Council's approach to the provision of parking in town centres be?	High support for free or affordable parking to encourage local shopping and support town centre businesses. Concerns were also raised about parking fees discouraging visitors, with some suggesting time-limited free parking to prevent misuse.	The Council acknowledges the strong support for free or affordable parking to encourage local shopping and support town centre businesses. It also recognises concerns that parking fees may discourage visitors. As part of the car parking strategy, the Council will explore options, including time-limited free parking, to balance accessibility, demand management, and support for the local economy.
	Some respondents suggested maintaining or even increasing current parking capacity, particularly in Hadleigh.	Comment noted see above

Question	Specific Issues Raised	Council Response/Action
Q72. What is your opinion of retail parks?	Many respondents appreciated retail parks for their convenience and ample parking.	Comment noted
	Concerns raised about retail parks drawing shoppers away from high streets, potentially harming local businesses.	The impact of development on town centres has been considered and Policy TC1 - Town Centres. Outside of designated town centres new development falling within Use Class E will be permitted if it will not have a significant adverse impact on the vitality and viability of town centres in Castle Point. A retail impact assessment is required for proposals of 1,500m ² in size or greater.
	Some felt retail parks lack character and called for a balance with traditional shopping areas.	Comment noted This has been considered and Policy TC3 - Retail Parks and Out of Centre Locations supports regeneration and redevelopment of Retail Parks where it makes more intensive use of the site.
Q73. How should hot food takeaways be managed in the borough?	Many felt takeaways are beneficial if properly managed, suggesting strict hygiene and location regulations.	This issue of managing hot food takeaways is considered by a Policy approach as proposed in Policy TC5 – Hot Food Takeaways and Fast Food Outlets.
	Some called for limits on the number of takeaways, especially near residential areas due to concerns about litter and noise.	Policy TC5 – Hot Food Takeaways and Fast Food Outlets. New hot food takeaways or fast food outlets will only be permitted in town centres, local shopping parades or in out of centre retail parks, and in locations that are over 400m away from the nearest school.

Question	Specific Issues Raised	Council Response/Action
	A few suggested incentives for takeaways offering healthier options	This has been considered with the introduction of a criterion in Policy TC5 – Hot Food Takeaways and Fast Food Outlets which requires a Health Impact Assessment of the proposal with measures identified to limit the impact on obesity levels within the local community and create a healthy food environment.
Q74. Do you support a more diverse range of uses in town centres, for example offices which would support the daytime economy, and flats, restaurants and bars that would support the evening economy?	84% of respondents support a more diverse range of uses in town centres. See response to quantitative questions Section 11.	Support noted
Q75. What issues do you think should be addressed through the borough-wide Design Code?	<ul style="list-style-type: none"> - Call for "good quality sustainable development" aiming for "net zero carbon." - Preserve "local character" with designs that fit and maintain "conservation standards." - Protect Green Belt and address environmental impacts. - Improve infrastructure to manage "higher density" impacts. - Preference for "smaller sites" and "low-rise flats" over big estates. 	These issues have been addressed in Policies in the Plan's chapter on achieving well designed places as well as other policies in the Plan.

Question	Specific Issues Raised	Council Response/Action
Q76. What issues do you think should inform the density of new development in the borough?	Strong emphasis on infrastructure capacity, particularly regarding transport and healthcare services, to avoid strain on local resources.	Comment noted; requirement for development to be supported by necessary infrastructure.
	Concerns about protecting Green Belt land, with suggestions to prioritize brownfield sites for higher-density projects.	The Strategy prioritises the redevelopment of previously developed land making effective and efficient use of land. Higher densities and greater mixes of use will be sought in areas with premium sustainability.
	Environmental considerations, including green space preservation and air quality, were also highlighted as critical factors.	These are important considerations in the assessment of the impact of development proposals. Policies in the plan have been devised to enable objective assessment.
Q77. If a planning application for a large development (100+ homes) comes forward, should a master plan be created guiding how the development should take place?	<ul style="list-style-type: none"> - High support for creating a master plan to ensure cohesive development and manage infrastructure. - Some felt each large development should undergo individual assessment, while others raised concerns about developers adhering to guidelines. 	<p>The support for master plans for large development sites has been addressed, see Policy D3 - Master Planning. The Council will expect the promoters of large sites to work with the Council to produce a master plan. An approved master plan must be in place for the relevant site allocation prior to the submission of any planning application.</p> <p>In preparing the master plan, the Council requires the applicant to demonstrate how they have engaged with key stakeholders and the local community.</p>
Q78. What amenity considerations should be applied when considering new developments adjacent to existing homes?	Major concerns included parking availability, noise, and privacy for existing residents.	<p>Design Policy D1- aims to:</p> <p>Ensure that neighbouring occupant's amenity is protected.</p>
	Respondents supported incorporating green spaces and ensuring infrastructure sufficiency.	<p>Ensure usable amenity space for new occupants is created.</p>
Q79.	<ul style="list-style-type: none"> - Many supported annexes for family needs but stressed that they should be limited to avoid 	Comments noted. The design of residential annexes is addressed under Policy D6 in the Plan.

Question	Specific Issues Raised	Council Response/Action
What are your feelings on the development of residential annexes within the curtilage of existing homes?	<p>overcrowding.</p> <ul style="list-style-type: none"> - Concerns raised about parking, privacy, and ensuring annexes align with neighbourhood character. - Some suggested case-by-case assessments based on property size. 	<p>Application for residential annexe within the curtilage of an existing dwellinghouse will be considered on a case by case basis.</p> <p>The proposal will be required to be of a size, design and layout sympathetic to the locality and not result in an unacceptable loss of parking, amenity space for the residents or the privacy and amenity of adjoining residents.</p>
Q80. How do you feel about public art being incorporated in new development (i.e. sculptures or murals)?	<ul style="list-style-type: none"> - Many respondents were supportive, seeing public art as a way to enhance community identity and aesthetics. - Some raised concerns over costs, suggesting that art installations be locally relevant and created by local artists. - A few opposed public arts due to worries about maintenance and subjective taste preferences. 	<p>This is addressed in Policy on Public Art. Policy D8 - Public Art:</p> <p>The Council will support the provision of high quality art. Local context/Historical and/or local important information is an important consideration</p> <p>Proposals for public art should be accompanied by clear commitments to their on-going maintenance and ownership.</p>
Q81. Do you have any views on protecting and enhancing the borough's heritage assets as set out above?	<ul style="list-style-type: none"> - Development close to heritage assets should not cause harm to it - Strong support for protecting heritage sites like Hadleigh Castle, with many citing their cultural and historic value. - Some respondents suggested increased funding for maintenance and preservation, while others recommended promoting these assets to boost tourism. - A few raised concerns about the cost of preservation but agreed on the importance of heritage. 	<p>Agree, see Policy D9 - Conserving and Enhancing the Historic Environment.</p> <p>Development proposals affecting a heritage asset (either designated or non-designated) will be expected to conserve, and where appropriate enhance, the setting of the heritage asset, in accordance with the requirements of national policy in NPPF.</p>

Question	Specific Issues Raised	Council Response/Action
Q82. What are your views on building new homes to a net zero standard in advance of national policy timeframes?	Strong support for net zero homes to reduce carbon emissions and future-proof housing.	Comments are noted and support is welcomed. This has been implemented through Policy SD4 – Net Zero Carbon Development. All new development should seek to minimise its impact on climate change. The plan will be consistent with the net zero carbon aspiration.
	Concerns about the higher costs, with some suggesting incentives for developers.	The impact on viability will be tested through the whole plan viability assessment to ensure that it will be deliverable and its policy requirements do not increase development costs to a degree where development becomes unviable.
	A few respondents concerned about potential impacts on housing affordability if costs are passed to buyers.	The impact on viability has been tested through the whole plan viability assessment
	Building regulations are the most effective approach to achieving net zero in the agreed timescales.	Comment noted
Q83. What do you think about large scale renewable energy generation (i.e., a solar farm) in Green Belt locations?	Mixed views, with some supporting renewable energy in Green Belt areas if it reduces carbon footprint and contributes to sustainability.	Mixed comments noted
	Concerns raised about potential impacts on natural landscapes and wildlife	Proposals will be assessed in terms of their impact under the relevant policies of the Plan. They will only be acceptable if well planned, well screened and are not visually intrusive.

Question	Specific Issues Raised	Council Response/Action
	A few respondents suggested prioritizing brownfield sites before using Green Belt land for renewable projects.	Comments noted. The strategy does prioritize the development of previously developed land.
Q84. Do you feel existing homes/buildings in the borough should be retrofitted to improve their energy efficiency?	Strong support for retrofitting to enhance energy efficiency, reduce emissions, and lower energy costs for residents.	Retrofitting existing buildings is more costly and time consuming than designing buildings to be net zero carbon in the first place. Policy SD4 – Net Zero Carbon Development (In Operation). Applications for residential extensions and conversions affecting existing buildings are encouraged to meet the minimum standards approach fabric specifications set out in the Policy and maximise renewable energy generation where practical and feasible. Alongside the planning process, opportunities for retrofitting renewable energy will be promoted. Many of these do not require planning permission.
	Concerns about the potential cost of retrofitting, with some suggesting government subsidies or incentives to support homeowners	Comment noted There are government incentives and help
	A few respondents emphasized prioritizing retrofitting for public buildings as a model for sustainable practices	Comment noted
Q85. Should the plan apply the optional requirement for increased water efficiency in new development?	Strong support for enhanced water efficiency standards to conserve resources and prepare for climate resilience.	This issue has been considered Objective 7 of the Plan is to Secure improved water efficiency in new buildings. Policy – Water Supply and Waste Water (SD9) will require all new residential developments to achieve a water efficiency standard of 90 litres per person per day. Where it can be demonstrated that this is not feasible

Question	Specific Issues Raised	Council Response/Action
		<p>part G2 and regulation 36(2)(b) of the Buildings Regulations will apply. All non-residential development should achieve full credits for Wat 01 of BREEAM</p> <p>The recent Future Homes Hub Water Efficiency Report (April 2024), to inform HM Government's roadmap for sets recommended water efficiency targets for 2025 and 2035 for seriously water stressed areas including Essex from 90-80 l/p/d.as follow:</p> <ul style="list-style-type: none"> • 2025 105 Litres Per Person Per Day (LPPPD) achieved through fittings approach and 90 LPPPD in seriously water stressed areas and • a Target 2035 90 LPPPD achieved through fittings approach and further innovation 80 LPPPD in water stressed areas.
	Some concerns about additional costs to developers and potential impacts on housing affordability	The impact on viability will be tested through the whole plan viability assessment to ensure that it will be deliverable and the policy requirements do not increase development costs to a degree where housing development becomes unviable.
	A few respondents suggested incentives or phased implementation to manage costs	Comment noted. There are government incentives like water efficiency credits and water management grants.
Q86. Do you feel that Sustainable Drainage Systems (SuDS) should be	Broad support for SuDS in both small and large developments to manage flood risk and enhance climate resilience.	Support welcomed and has been taken on board in various policies of the plan

Question	Specific Issues Raised	Council Response/Action
incorporated into smaller, as well as major developments?	Some concerns about costs and feasibility for smaller sites, with suggestions for adaptable guidelines.	Comment noted and welcomed. Requirement for Sustainable Drainage Systems on small sites could introduce additional costs and considerations, but that needs to be addressed and negotiated during detailed planning application stage. It is unlikely to make them unviable.
Q87. What do you think new development should be required to do in order to support a healthy design in new development?	Strong support for integrating green spaces, walking paths, and cycling infrastructure to promote physical activity.	The issue of development and health impact has been considered. The NPPF states that planning policies should aim to achieve healthy, inclusive and safe communities which promote social interaction and create opportunities for meetings between people and community cohesion.
	Emphasis on air quality improvements, natural lighting, and accessible recreational facilities.	Policy Infra3 – Improving Health and Wellbeing is designed to ensure new development promotes good health. A health impact assessment will be required consistent with thresholds set out in the Policy.
	Some respondents suggested incorporating community gardens and limiting fast-food outlets near residential areas	Green spaces, walking paths, cycling infrastructure and air quality are all important considerations falling under different policies of the plan. A policy deals with fast food outlets which manages their location and keeps them away from schools and residential areas to protect amenity.
Q88. How do you feel the Plan should help to address existing and potential new pollution impacts? -	Strong support for reducing traffic and vehicle emissions through public transportation and cycling infrastructure. Calls for improved drainage and sewage systems to prevent pollution run-off.	These concerns have been addressed under various policies in the Plan including Policy SD6 on Pollution Control. Development proposals should be designed to manage and reduce pollution through energy and water efficient

Question	Specific Issues Raised	Council Response/Action
	<p>-Emphasis on green spaces and tree planting to absorb pollutants</p> <p>Concerns about new developments increasing pollution, with calls for sustainable practices.</p>	<p>design, the installation of sustainable drainage systems, and the delivery or enhancement of green infrastructure. Section 106 Agreement may be used to secure measures to control pollution and/or disturbance necessary to make the impacts of development acceptable.</p> <p>The Council will seek to locate new development, to the most accessible locations prioritising travel by active and sustainable modes.</p> <p>The Essex Local Transport Plan, amongst other things seeks a reduction in greenhouse gas emissions and also prioritises the improvement of journey times on key routes passing through Castle Point including the A130, A13 and A129 as key priorities for the South Essex sub-area.</p>
Q89. What new uses could be acceptable within the Green Belt area to support and enhance its use (i.e., cafes or sports infrastructure, etc)? Please provide details of any acceptable uses.	Support for small cafes/visitor centres to enhance access and family-friendly use.	These issues have been addressed in Policy GB1 - Development affecting the Green Belt.
	Preference for low-impact recreation (outdoor gyms, trails) to promote health and preserve Green Belt	The plan adopts an urban first approach and it's aspiration to optimise urban land in town centres and other sustainable locations. It supports integrated access to public open space, and the enhancement of the multifunctional green infrastructure network.
	Calls for nature reserves and educational areas to protect biodiversity	Under Policy GB1 The Council will support opportunities to positively preserve and enhance the Green Belt for use by residents as a natural and leisure resource.
	Concerns about large commercial developments affecting natural character	Where development is proposed within the Green Belt, it will be expected to:

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	Emphasis on preserving areas like Salvation Army Fields as green space.	<ul style="list-style-type: none"> a. improve access for leisure uses; b. improve connectivity particularly via active and sustainable modes; c. improve outdoor sport and recreation provision; d. enhance the appearance of the landscape; e. improve visual amenity; f. enhance biodiversity; g. facilitate sustainable flood risk management; or h. improve damaged and derelict land.
Q90. How do you feel the risk of flooding should be managed in new development?	<ul style="list-style-type: none"> - Support for strict planning to avoid high-risk flood zones. - Recommendations for sustainable drainage systems (SUDS) to manage water. - Calls to protect natural floodplains and add buffer zones. - Urges for careful review of flood-prone areas before approving developments. 	<p>These are all important issues relating to the protection of development from future risk of flooding. They are addressed in the Plan via Policy SD2 - Non-Tidal Flood Risk Management.</p> <p>New development proposals within an area at risk of fluvial flooding, or within an area at risk from surface water flooding in a 1 in 100 year event, will be considered against the sequential test set out in the NPPF.</p> <p>Where a development proposal is located in an area at risk of fluvial or surface water flooding and passes the sequential test and, where appropriate, the exception tests, the design and layout of development must be taken to avoid built development on those parts of the site most at risk of flooding.</p> <p>All development proposals will be required to manage surface water run-off so that the rate is no greater than the run-off prior to development. Where possible, sustainable drainage systems should be incorporated.</p>

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	Concerns about current flood defences needing regular maintenance	<p>Policy SD1 - Tidal Flood Risk Management deals with flood defences</p> <p>The Council will support the necessary improvements to the sea defences in the Borough as set out in the Thames Estuary 2100 Plan.</p> <p>A 19m wide buffer of land adjacent to the existing flood defences on Canvey Island, is safeguarded for future flood defence works, landscaping, environmental enhancements and amenity.</p>
Q91. What, beyond improved flood defences, do you want to see as part of the upgrades to coastal defences?	Support for enhancing coastal aesthetics through regular maintenance, beach clean-ups, and improved lighting to make the areas more appealing.	<p>This issue has been considered in Policy ENV2 Coastal & Riverside Strategy which in addition to flood defences will look to:</p> <p>Improve access to and enjoyment of the coast; Enhance the cultural and social value of the coastal areas; and</p> <p>Improve the ecological networks along the coast and coastal habitats.</p>
	Emphasis on protecting coastal habitats and integrating green spaces to promote biodiversity	<p>Comment noted.</p> <p>Proposals which seek to deliver the green and blue infrastructure recommendations of the South Essex Estuary Park (SEE Park) will be supported.</p>
	Calls for improved drainage systems and erosion control measures, such as planting vegetation to stabilize the coast.	<p>Policy ENV2 – Coastal & Riverside Strategy also looks to manage tidal flood risk and address the implications of climate change on flood risk.</p>

Question	Specific Issues Raised	Council Response/Action
	Requests for additional public amenities like parking, restrooms, and cafes to improve accessibility and usability of coastal areas	Comment noted see above
Q92. How would you like the plan to protect and improve the borough's stock and network of open spaces?	Open space should be delivered alongside new housing	These issues have been recognized in strategic Policy SP1: Supporting Enhancement of the Borough's Green Spaces and Infrastructure policy on the provision of Open Spaces (infra 4)
	Strong emphasis on protecting Green Belt and floodplain areas from development to preserve natural landscapes	Policy on Open Space Infrastructure requires new open spaces to be delivered in large developments, 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.
	- Calls for improved maintenance of open spaces, with requests for leaseholders and responsible parties to take greater responsibility. .	Proposals that improve access to open spaces, including those that are not currently publicly accessible, will be supported
	- Support for enhancing accessibility to open spaces, including adding playgrounds, seating, and pathways to encourage use	The Council will support the enhancement of the borough's green spaces and blue infrastructure for the benefit of wildlife, biodiversity, landscape, amenity, climate resilience.
	- Interest in environmental protection, specifically preserving wildlife habitats and preventing ecosystem disruption.	Improving the function of the borough's Green Belt and coastal areas by improving access to and through it, particularly for walking and cycling.
Q93. What aspects of Castle Point's landscape should be	Emphasis on protecting Green Belt and open spaces from development to maintain natural landscapes.	The Plan contains robust policies to protect the Green Belt and the landscape.

Question	Specific Issues Raised	Council Response/Action
protected and enhanced through new development?	Support for preserving historical sites and enhancing access to heritage areas.	Comment noted This has been taken account of in Policy D9 - Conserving and Enhancing the Historic Environment: Development proposals affecting a heritage asset (either designated or non-designated) will be required to conserve, and where appropriate enhance, the heritage assets and its setting, in accordance with the NPPF.
	Calls to maintain water drainage systems and protect Canvey Lake	Policy SD2 - Non-Tidal Flood Risk Management will deal with flooding and drainage systems. New development proposals within an area at risk of fluvial flooding, or within an area at risk from surface water flooding in a 1 in 100 year event, will be considered against the sequential test. This is covered in Policy C7 – Canvey Lake proposed in the Plan. Land at Canvey Lake, will be master planned as a multifunctional green space which will deliver increased capacity of the Lake for flood water storage, reducing flood risk to those living on the periphery of the Lake.
	Interest in improving parks and public spaces for community use.	These issues have been recognized in strategic Policy SP1: Supporting Enhancement of the Borough's Green Spaces and in Infrastructure policy on the provision of Open Spaces (infra 4).
Q94. Are there opportunities to improve areas of Castle Point's landscape?	<ul style="list-style-type: none"> - Selective Planning Permissions: Some respondents suggested stricter planning to ensure landscape preservation. - Maintenance of Open Spaces: Calls for better management and regular upkeep of open spaces. 	These concerns are noted and have been considered. The Plan and policies will ensure that the protection and enhancement, where possible, of the borough's landscape and green infrastructure. Careful consideration will be made of potential areas where

Question	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> - Parks and Green Spaces: Interest in enhancing parks and adding green spaces with better facilities. 	<p>green infrastructure can be extended utilising areas of environmental value.</p>
<p>Q95. Which landscape features should be protected in new development, and how?</p>	<ul style="list-style-type: none"> - Green Belt & Open Spaces: Emphasis on protecting the Green Belt land and open spaces from development - Flood Plains & Water Features: Protection of flood plains and drainage systems is seen as crucial - Woodland & Trees: Strong advocacy for preserving woodlands and trees 	<p>Comment noted The Plan contains many policies with the objective of protecting these features; Green Belt & Open Spaces, flood plains, woodland & Trees.</p>
<p>Q96. What approach do you feel should be taken to protection of habitats and wildlife sites?</p>	<ul style="list-style-type: none"> - No Building or Development: Some respondents emphasized no further building to protect habitats and allow wildlife to thrive - Consulting Specialists: Suggestions to involve environmental experts to guide protection efforts - Wildlife & Habitat Protection: Strong emphasis on protecting natural habitats and avoiding disruption from new development 	<p>Comments noted A key objective of the plan is to protect wildlife habitats and environmentally designated sites. This has been carried into many of the policies particularly in the Environment chapter of the Plan: Protecting our Biodiversity and Landscape (Policies ENV1 - ENV5).</p>
<p>Q97. Would you support seeking a higher than 10% Biodiversity Net Gain requirement?</p>	<ul style="list-style-type: none"> - Support for Higher BNG: Many respondents endorse increasing the Biodiversity Net Gain (BNG) requirement above 10%, highlighting its importance for ecosystem preservation and future resilience - Opposition to Higher BNG: Some respondents express concerns over feasibility, cost, and practical implementation, particularly in Green Belt areas - Environmental Benefits: Additional comments discuss the broader environmental and ecosystem benefits of a higher BNG target 	<p>Comments welcomed and noted. There is mixed support expressed for BNG. BNG requires that where development occurs any harm to biodiversity is offset through compensatory provision that secures an overall uplift of biodiversity of 10% above that which originally existed.</p> <p>A policy has been developed in the Plan dealing with BNG: Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain. The requirement is for 10% BNG</p>

Question	Specific Issues Raised	Council Response/Action
		<p>on all applicable brownfield sites; and 20% on all applicable greenfield sites.</p> <p>The Environment Act 2021 mandates that most developments should deliver at least 10% BNG, but local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable.</p> <p>Viability testing has indicated it is possible to secure 20% BNG on sites to improve contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex.</p>
<p>Q98.</p> <p>Would you support the introduction of an Urban Greening Factor seeking to increase biodiversity in urban areas?</p>	<ul style="list-style-type: none"> - Conditional Support: Some respondents support the Urban Greening Factor with conditions, such as ensuring sustainable and practical implementation - Opposition: Some express doubts about feasibility or necessity, suggesting it might bypass proper biodiversity considerations - Support for Urban Greening: A group supports the Urban Greening Factor for its potential benefits to urban biodiversity 	<p>General support is noted.</p> <p>Urban greening is an approach to increase green infrastructure within the urban fabric leading to a host of benefits, such as flood mitigation, aesthetics, urban cooling.</p> <p>This has been taken on board in Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain which requires sites with low existing biodiversity, such as urban brownfield sites, an Urban Green Factor score of 0.4 will be required from all new development.</p>
<p>Q99.</p> <p>What do you feel about the management of agricultural land?</p>	<p>Protection from Development: Strong concerns were raised about preventing the conversion of agricultural land to housing or commercial use</p>	<p>This is addressed in Policy ENV6 – Best and Most Versatile Agricultural Land</p> <p>Proposals should protect the best and most versatile agricultural land as far as possible, to support opportunities for food production and the agricultural economy.</p>

Question	Specific Issues Raised	Council Response/Action
		<p>The spatial strategy prioritises the development of Previously Developed land. PDL excludes land that is or was last occupied by agricultural or forestry buildings. When development is necessary proposal prioritise the use of poor quality land over high quality agricultural land.</p> <p>NPPF: Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. This will be a key consideration.</p>
	Balanced Use & Conservation: Many responses emphasize wise management of agricultural land, including promoting sustainable practices and diversifying land use responsibly	<p>The NPPF Planning policies and decisions should enable:</p> <p>the development and diversification of agricultural and other land-based rural businesses.</p>
	Trust in Farmers: Some respondents prefer that management decisions remain with farmers, trusting their expertise	<p>Comments noted see above response.</p>
Q100. Would you like to see more community hubs which deliver a range of community facilities in one place as part of the plan?	<ul style="list-style-type: none"> - Support for Hubs: Many prefer central hubs for accessible services, especially in growing areas - Preference for Local Facilities: Some prefer smaller, nearby facilities over large hubs - Concerns: A few note potential costs and feasibility - Desired Facilities: Interest in youth clubs, mental health support, libraries, and inclusive spaces 	<p>Comment noted and taken into account in infrastructure policy (infra1) on Community Facilities. Sites where many facilities are located together are supported due to the benefits, they offer in terms of accessibility to those without private means of transport. The development of community hubs is recognized as being an efficient way of delivering multiple uses onto a single site, providing flexibility for different users at different times of the day or week.</p>

Question	Specific Issues Raised	Council Response/Action
		infrastructure projects identified in the IDP will be supported with potential sources of funding identified.
Q101. How do you think new health infrastructure should be brought forward in the borough?	<ul style="list-style-type: none"> - Expansion of Local Health Services: Many respondents support new clinics, GP facilities, and hospitals to meet growing health demands - Accessible, Localized Services: Emphasis on making health services more accessible, especially in areas with population growth - Funding and Staffing Concerns - Some raise issues about securing adequate resources and staff to sustain expanded services 	<p>This issue has been recognized in the Plan and addressed. Housing and employment growth across a wide area would likely have an impact on future healthcare service provision.</p> <p>Policy Infra3 - Improving Health and Wellbeing has been designed to deal with development that would result in an increase in demand for healthcare facilities. Developer contributions towards new or enhanced facilities will be sought.</p> <p>On larger allocated sites there may be a requirement to make land available.</p>
Q102. What type of improvements to entertainment and leisure facilities would you like to see in your local area?	<ul style="list-style-type: none"> - Recreational Spaces: Parks, outdoor gyms, and pet-friendly areas - Sports Facilities: Pools, gyms, and varied sports options. - Cultural Venues: Theatres, cinemas, and music spaces. - Family & Youth Facilities: Youth centres and playgrounds. - Dining & Nightlife: More cafes, dining, and nightlife options. 	<p>The planning challenges recognise the need for different types of infrastructure both natural and built to support growth. Policies in the Plan deal with provision of the various types of infrastructure. The Infrastructure Delivery Plan will identify the necessary infrastructure who will deliver it and how it will be funded.</p> <p>The plan provides detailed policy in relation to design and infrastructure provision.</p>
Q103. How do you think new education infrastructure should be brought forward in the borough?	<ul style="list-style-type: none"> - Expansion of Schools: Strong support for new primary and secondary schools, especially in growing areas. - Funding & Staffing Concerns: Concerns about funding and staffing to support expanded facilities - Local Access: Emphasis on localized education 	<p>Comments noted</p> <p>Policy Infra2 – Education, Skills and Learning requires here a development, increases demand for education facilities beyond those available within the local area, development will be required to make proportionate</p>

Question	Specific Issues Raised	Council Response/Action
	<p>to serve nearby communities, reducing travel.</p> <ul style="list-style-type: none"> - Quality & Curriculum: Calls for a focus on quality education and practical, trade-based learning. 	<p>contributions support capacity improvements to education infrastructure.</p> <p>The Castle Point Infrastructure Delivery Plan establishes where new educational facilities are required based on the growth identified within this plan. Developers will be expected to provide contributions for additional school / early years places or to create new educational establishments arising from the need generated from the development.</p> <p>The Council will work with ECC and other education providers to deliver improvements to schools.</p>
<p>Q104.</p> <p>How do you feel the cultural environment can be improved in the borough?</p>	<ul style="list-style-type: none"> - Support for Arts Venues: Interest in more art spaces, theatres, and exhibitions to enhance local culture. - Community Events: Desire for festivals and public events to foster community and celebrate diversity. - Public Space Enhancements: Improved, cleaner, and more attractive public spaces. - Heritage Preservation: Support for museums and efforts to protect local history. 	<p>The comments in relation to the cultural environment are welcomed and noted</p> <p>See Policy E4 – Culture and Tourism. Development that can be demonstrated to support sustainable growth in the cultural and tourism sectors within the borough will be supported.</p>
<p>Q105.</p> <p>What do you feel about the protection of public houses from speculative development?</p>	<ul style="list-style-type: none"> - Support for Protection: Many respondents support protecting public houses, especially those with historical value, as they contribute to local heritage and community life. - Concerns with speculative development and losing these places to commercial development, which could disrupt community connections. 	<p>The Plan contains a Policy Public Art (D8) which will support the provision of high quality, sustainable public art which is well integrated into the public realm; and is publicly accessible.</p>

Question	Specific Issues Raised	Council Response/Action
Q106. How would you like new communications infrastructure to be provided as part of new developments?	<ul style="list-style-type: none"> - Fiber-Optic Internet: Strong support for fiber as a standard with diverse providers. - 5G & Mobile Coverage: Calls for reliable mobile connectivity - Aesthetic Integration: Suggestions to blend infrastructure with landscape. - Future-Proof Tech: Interest in sustainable, advanced tech. 	<p>As new development increases the demand for infrastructure to be upgraded in order to provide the future occupiers with the effective broadband connectivity is required. This is especially the case for those sites that have been identified for development and are peripheral to the existing urban areas.</p> <p>Proposed Plan Policy Infra6 - Communications Infrastructure in the Plan requires all new homes and commercial premises to have fibre optic broadband provision to the curtilage of the house, or to the communal area of a flat development prior to first occupation.</p> <p>The policy also requires proposals for the siting and design of permanent telecommunications structures to be sensitively and appropriately designed and which respect the setting and location.</p>
Q107: What do you feel about the provision of utilities to new developments?	<ul style="list-style-type: none"> - Capacity Concerns: Fear of overburdening current utilities; need upgrades before new builds. - Sustainability: Calls for renewable energy (e.g., solar panels) in new homes. - Infrastructure Improvements: Demand for modernized water and sewage systems. - Comprehensive Planning: Support for ensuring full utility provision from the start. 	<p>The Infrastructure Delivery Plan will identify infrastructure including utilities to meet new development. The council will work with utilities companies to ensure that the network can supply the new homes. The Council will coordinate with infrastructure providers such as Anglian Water as part of the plan making process.</p>
Q108: Should land be allocated for large scale renewable energy generation?	<ul style="list-style-type: none"> - Support: Broad support for renewables like solar/wind farms; some prefer dual-use or brownfield sites. - Environmental Concerns: Desire to protect Green Belt; preference for less impactful locations. 	<p>In response to this the Plan set policies on energy efficiency and renewable energy in order to achieve zero carbon emissions</p> <p>It is further considered that off-site renewables in the form of a solar array may be acceptable, as such</p>

Question	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> - Opposition: Concerns over visual impact, land use, and project scale. - Small-Scale Preference: Some prefer community-based, smaller projects. 	<p>installations are low lying and can be compatible with nature conservation ambitions. However, any renewables provided on the site would need to secure a high level of Biodiversity Net Gain, recognising the ecological value of the site in the first instance.</p> <p>Policy ENV1 - Protecting and Enhancing the Landscape and Landscape Features requires that all development proposals should be designed to have regard to the character of the landscape and seek to avoid harm to the landscape as a result of adverse impacts. Careful planning, design and location can minimise impact in the countryside including visual impacts.</p>
Q109. How should waste management and refuse storage be designed into new developments?	<ul style="list-style-type: none"> - Dedicated Storage: Support for designated bin areas - Eco-Friendly: Interest in recycling and composting stations. - Aesthetic & Odor Control: Need for concealed waste areas. - Accessibility: Importance of easy access for residents and collectors. 	<p>Comments noted and have been considered.</p> <p>Policy D1 – Design Objectives. All new development should provide adequate and appropriately designed waste management facilities.</p> <p>Properties can be accessed in a safe and convenient way by waste collection operative and delivery vehicles.</p>
Q110 Which of the following active travel infrastructure improvements would you be in favour of?	<p>The majority of respondents favoured improvements to pedestrian paths and walkways (272) followed by improvements to road crossings.</p>	<p>This has been considered and will be given significant weight in the assessment of development proposals</p> <p>See Policy T3 - Active Travel Improvements. All new development should be planned around a network of safe and accessible active travel routes, where dedicated traffic free links make walking and cycling the best choice for day-to-day trips supporting healthy and active lifestyles. This requirement should also be reflected in the master plans developed in response to this plan.</p>

Question	Specific Issues Raised	Council Response/Action
Q111. What issues do you think should be identified in Transport Assessments, and managed through Travel Plans?	Traffic Congestion: Concerns about increased congestion from new developments, especially on major roads like the A13 and A127.	<p>Proposed policies promote sustainable transport. The Council will seek to secure congestion relief on roads and at junctions within the borough by delivering the transport improvements identified in the Infrastructure Delivery Plan.</p> <p>The transport assessment for the plan established an initial schedule of interventions which identified amongst other things a series of improvements that could be made to the local walking and cycling networks to improve opportunities for walking and cycling locally.</p> <p>The Council will work with the local highways and transportation authority and local transport service providers to secure transport networks in Castle Point, and will support the local transport authority in securing improvements to the A13, A127 and A130, and associated junctions</p>
	Public Transport Needs: Calls for improved bus routes and frequent services to reduce car dependency.	<p>Improvements to Public Transport Infrastructure and Services is a key policy objective</p> <p>In line with Policy T1 (Transport Strategy) the Council will seek to secure public transport infrastructure and service improvements within the borough by delivering the transport improvements identified in the Infrastructure Delivery Plan.</p>

Question	Specific Issues Raised	Council Response/Action
	Road Safety: Emphasis on safer pedestrian crossings and cycling access.	This issue has been taken on board and proposals for additional active travel routes through open spaces will be supported, subject to their design providing safe and inclusive access. This includes the creation of routes to provide recreational opportunities for walkers, cyclists and horse riders.
	Environmental Impact: Concerns about pollution and air quality due to traffic	See Policy T1 - Transport Strategy. The Council will work with the local transport authority and local transport service providers to secure transport networks in Castle Point that deliver net zero carbon emissions by 2050 and ensure local air quality is maintained at acceptable levels.
Q112 What type of road infrastructure needs to be improved over the plan?	Road maintenance including addressing potholes was ranked by the majority of respondents as the top priority for road infrastructure, followed by increased capacity and junction improvements.	Comments noted. Essex County Council prioritises repairs based on risk. For example potholes are addressed quickly to keep roads safe. The Plan policies support improvement of junctions and roads within the borough which bring about congestion relief and reduce emissions from waiting vehicles. Developer contributions will be secured where a new development will exacerbate local congestion and will benefit from the junction improvements.
Q113. Which parts of the highway network should be prioritised for improvement?	- Major Roads: Emphasis on improving main routes like A13 and A127 to manage traffic flow and accessibility. - Local Roads: Calls for maintenance on residential roads, including pothole repairs.	All comments are noted See responses to Q11 and 12 above which address the relevant issues raised.

Question	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> - Junctions: Specific focus on problematic junctions, such as Saddlers Farm and Waterside Farm, to ease congestion. - Safety & Access: Concerns about pedestrian and cyclist safety, especially on high-traffic roads. 	
Q114. Are there any new transport routes that you feel should be introduced to provide better/quicker routes to ease congestion?	Additional Access for Canvey Island: Strong demand for a third access road to improve safety and reduce congestion.	The Council is committed to working with key stakeholders in preparing an Access to Canvey feasibility study that looks at the potential highway and sustainable mode options for improved access to and from the Island, as well as improved east-west movements.
	New Road Connections: Proposals for connections between A127 and A13, and extensions to Canvey Way.	Favourable consideration will be given to development proposals which fully mitigate their impacts on highway and junction capacity and safety.
	Public Transport Routes: Calls for new bus routes linking train stations, hospitals, and key areas to reduce car use.	<p>This has been considered in Policy C5 for Improved Access to and around Canvey Island</p> <p>A key objective of the transport strategy is to secure improvements to the coverage, reliability, frequency and quality of local bus services.</p> <p>The Infrastructure Delivery Plan lists the type of infrastructure needed in the borough, potential costs and timeframes for delivery. These include improvements and expansions to public transport, and bus services. Developer contributions will be sought to ensure new development is connected into local bus services network.</p>

Question	Specific Issues Raised	Council Response/Action
	Bypass and Ring Road Options: Suggestions for a bypass or ring road to divert traffic from congested areas	<p>Comment noted</p> <p>The transport strategy policy proposed in the plan supports the improvement of junctions and roads within the borough which bring about congestion relief. Developer contributions will be secured where a new development will exacerbate local congestion and will benefit from the junction improvements. Where congestion at a junction is severe and cannot be mitigated to an acceptable level, development impacting on the junction will be refused.</p> <p>The Council will support the local transport authority in securing improvements to the A13, A127 and A130, and associated junctions in accordance with proposed transport Policy T2 - Highway Improvements in the plan.</p>
Q115. What would you like the Plan to do to assist the use of modes other than the private car?	<ul style="list-style-type: none"> - Improved Public Transport: Strong support for more reliable and frequent bus/train services to reduce car dependency. - Cycling and Walking Infrastructure: Calls for safe, dedicated cycle paths and pedestrian walkways to promote active travel. - Sustainable Options: Some suggest promoting electric bikes and green transport. - Affordability and Accessibility: Emphasis on affordable, accessible options for broader community use. 	<p>These comments have been taken into account and are reflected in the development of transport policies. See above responses.</p> <p>Policy T3 - Active Travel Improvements</p> <p>All new development should be planned around a network of safe and accessible active travel routes, where dedicated traffic free links make walking and cycling the best choice for day-to-day trips supporting healthy and active lifestyles and reduce demand for travel by car.</p>
Q116 Rank these bus improvements in order of preference	Improved bus frequency was ranked by the majority of respondents as the preferred option for bus services, followed by wider network and route improvements, and starting earlier and finishing later respectively.	The Infrastructure Delivery Plan lists the type of infrastructure needed in the borough, potential costs and timeframes for delivery. These include improvements and expansions of public transport, and bus services.

Question	Specific Issues Raised	Council Response/Action
		Developer contributions will be sought to ensure new development is connected into local bus services.
Q117. What approaches to improving pedestrian movement in and around centre in the borough would you like to see?	<ul style="list-style-type: none"> - Enhanced Walkways: Strong support for better-maintained pavements and expanded pathways. - Safety Measures: Emphasis on more pedestrian crossings, traffic lights, and lighting. - Accessibility for Disabled and Elderly: Calls for wheelchair-friendly walkways. - Green and Scenic Pathways: Interest in landscaped, scenic routes for walking. 	<p>The comments are key objectives in the transport strategy.</p> <p>Policy T1 actively encourages walking and cycling as a means of delivering a net zero transport network, and therefore it is especially important that walking and cycling access to sites is safe. The Development Management Policies set out standards for cycling and footway access that should be applied.</p> <p>Securing improvements to the local walking and cycling networks and associated infrastructure across the area, with developer contributions ensuring that new development is connected into these networks.</p>
Q118. What do you think about the proposed parking standards?	<ul style="list-style-type: none"> - Support for Standards: Some respondents find the standards adequate or acceptable, with a few suggesting adjustments for larger homes. - Concerns About Insufficient Parking: and potential overflow issues, advocating for more parking to prevent street congestion. - Environmental Considerations: Strong support for eco-friendly options, like EV charging stations and sustainable practices. - Desire for Flexibility: A few suggest standards should vary by area and property type. 	<p>Mixed expressions of views are noted.</p> <p>Views taken into account with a balanced policy introduced in the plan to deal with the issues raised.</p> <p>Policy T7 - Parking Provision</p> <p>Proposals for development will be expected to have regard to the most up to date Essex Parking Standards.</p> <p>The standards for Electric Vehicle Charging provision set out in the EPOA Parking Guidance will be applied.</p>

Question	Specific Issues Raised	Council Response/Action
	Desire for Flexibility: A few suggest standards should vary by area and property type.	The EPOA Parking Guidance use zonal mapping to apply parking requirements based on the accessibility of a location to service provision and to public transport provision.
Q119. What measures would help to reduce the impact of rat running on unsuitable routes in the borough?	<ul style="list-style-type: none"> - In order to help to reduce the impacts of rat-running on unsuitable routes in the borough road calming measures (153 respondents) was seen as the most effective, followed by reducing speed limits. 	<p>Comment noted</p> <p>Policy T5 - Highway Impact</p> <p>The required Transport Assessment or Statement must demonstrate how the impacts of the development on the highway network will be mitigated to limit significant effects on highway junction capacity and safety.</p>

7.2 Regulation 18 Stage Quantitative Questions

These are the questions from the Regulation 18 stage consultation which took place between 22 July and 16 September 2024. It required respondents to express a preference for a value or to rank given choices in order of preference.

Question 41

What do you think the required Castle Point Plan housing need figure should be? Please select your preferred choice from the options below (For delivering the housing growth we need):

Response

As can be seen from the graph below most respondents to the question considered that the housing requirement should be based upon the urban capacity that exists to accommodate future growth.

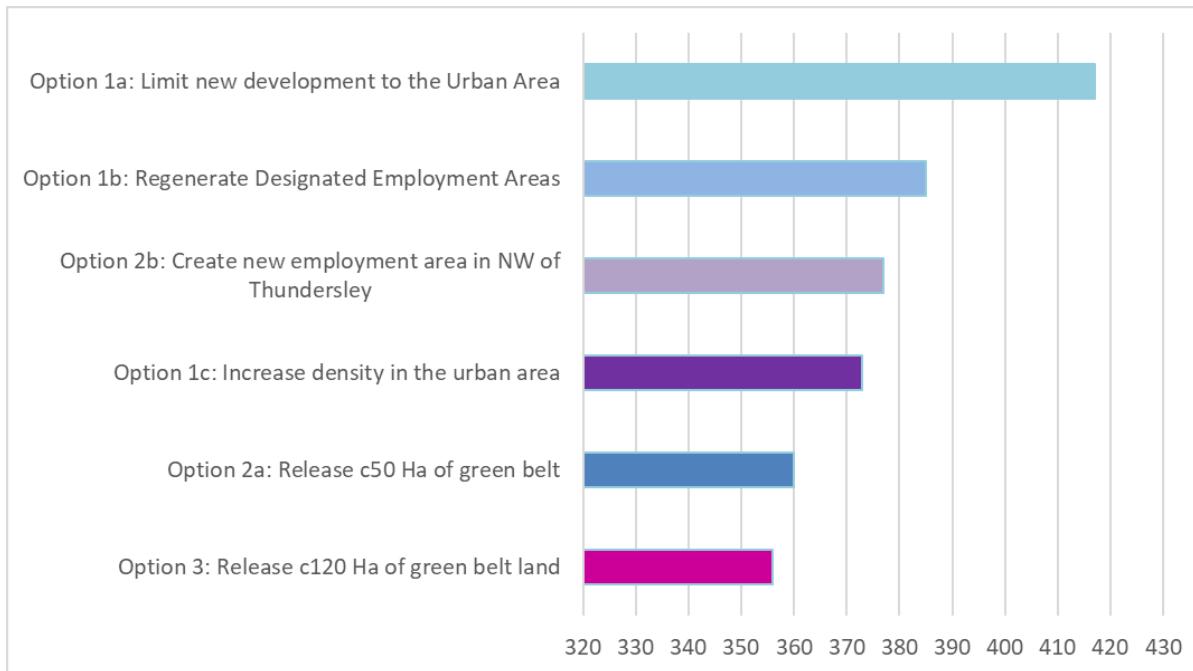


Question 42

Please rank the following options in your order of preference for delivering the housing growth we need (1 being your most preferred option):

Response

As can be seen from the graph below most respondents favoured the option (1a) of limiting development to the urban areas in order to deliver the housing need. This was followed by related option (1b) of the regeneration of designated employment areas within the urban area to meet local housing needs. However, there was also a significant support for options to increase density in existing urban areas and for the release of Green Belt land.



Question 47

Please rank the following outcome options in your order of preference to show what you feel should be delivered alongside new housing in the Plan (1 being your most preferred option):

Response

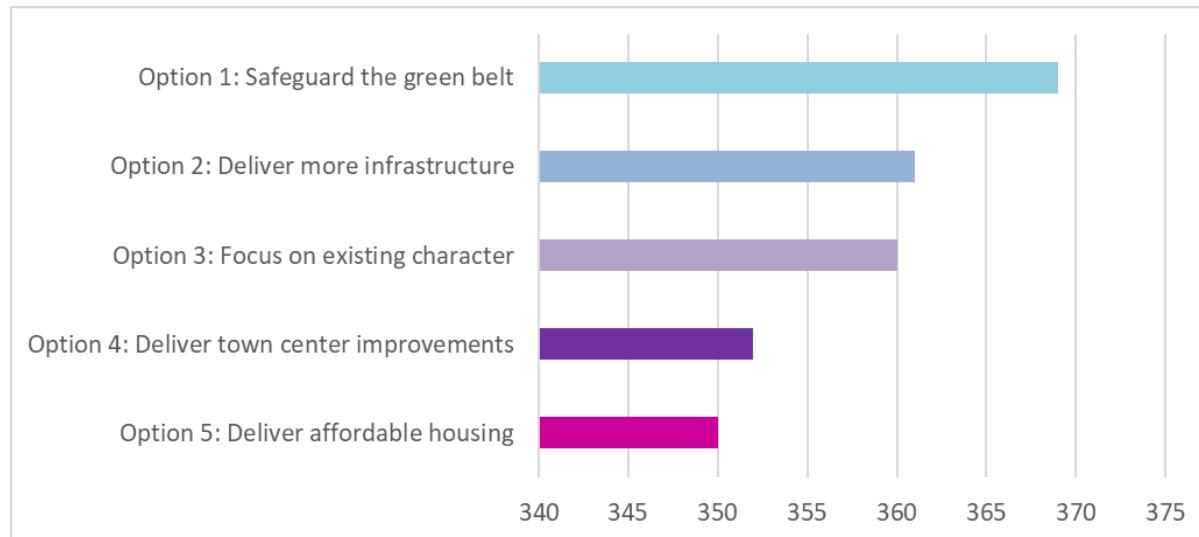
In terms of the preference as to what should be delivered alongside new housing the responses indicated a strong desire for the provision of new community infrastructure, followed by a focus on improving the operation of the transport network and the provision of affordable housing.

Question 49

What benefits could justify increased density in new development in the Borough? Please rank the following in your order of preference (1 being your most preferred option):

Response

All the suggested benefits resulting from an increase in development density on proposed housing sites received strong support particularly if it safeguards the Green Belt from development; if it delivers infrastructure; and if it is in keeping with existing character respectively.



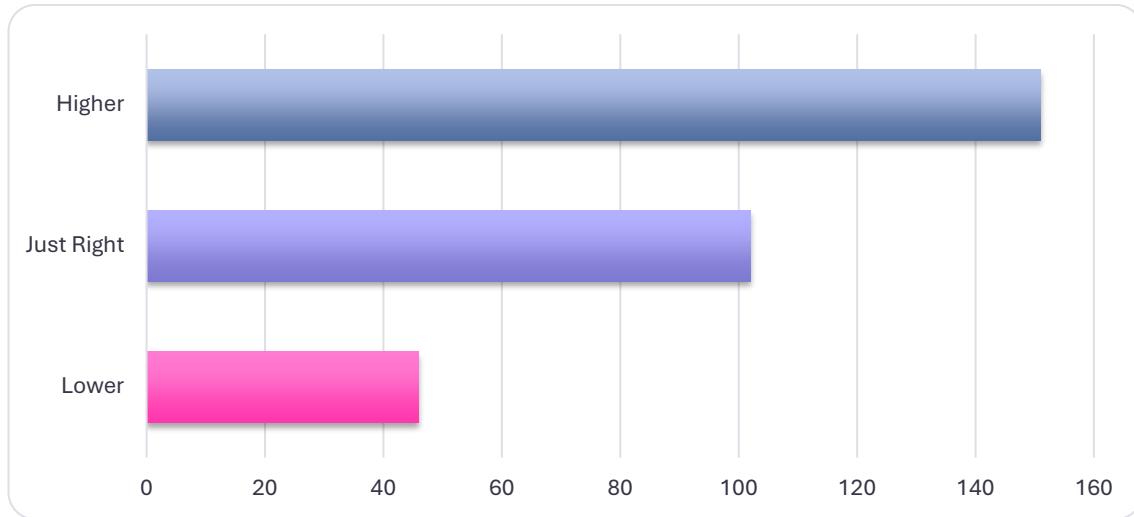
Question 51:

Which type of affordable housing product do you want to see prioritised? (Please select your preferred levels)

Responses

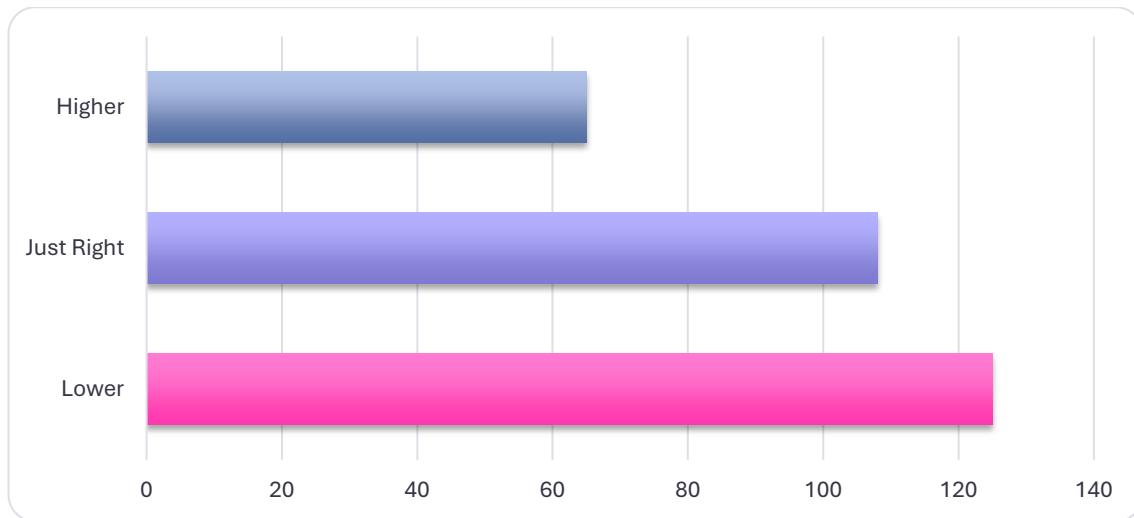
Type prioritised - First Homes: Government/Evidence benchmark = 17 houses per year)

The majority of respondents (151) to the question considered that there should be a higher provision of First Homes than the 17 identified in the Housing Needs Assessment. This was followed by 102 who considered 17 to be just right. Forty-six respondents thought the provision of First Homes should be lower.



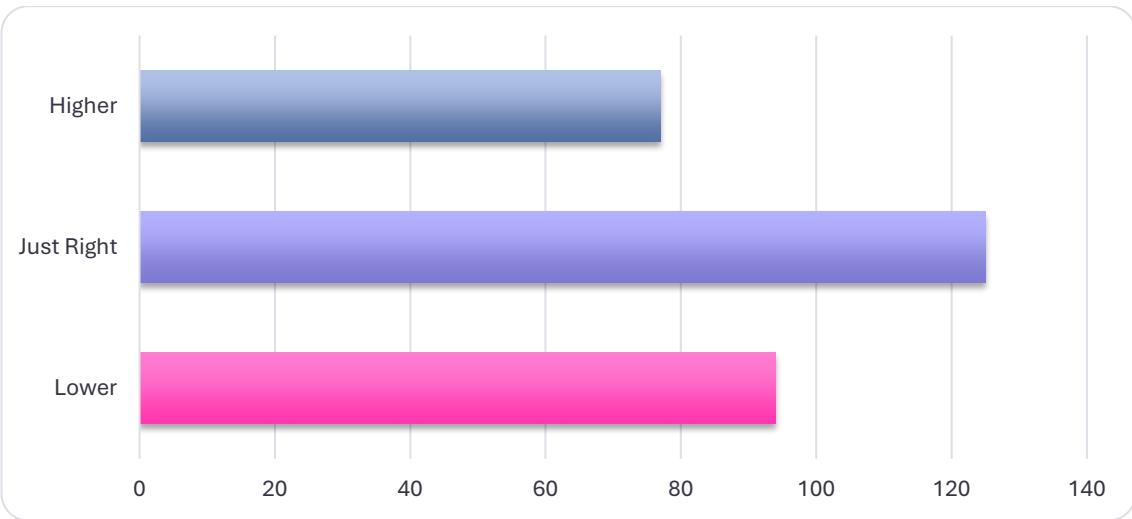
Type prioritised - Social Housing: Government/Evidence benchmark = 50 houses per year)

Most of the respondents to the question (125) consider that there should be a lower provision of social rented housing, followed by 108 respondents who considered 50 dwellings per annum to be just right.



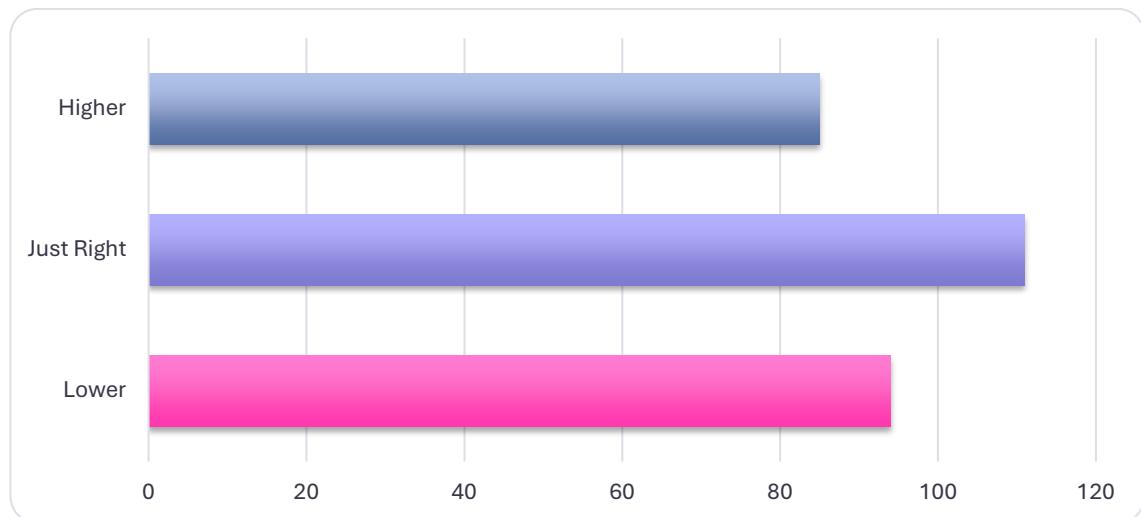
Type prioritised - Affordable rent: Government/Evidence benchmark = 50 houses per year)

The majority of respondents supported the provision of 7 affordable rent dwellings per annum to be just right.



Type prioritised - Total Affordable Housing: Government/Evidence benchmark = 69 houses per year)

The majority of the respondents (111) considered that a provision of 69 affordable homes per annum from all types to be just right.



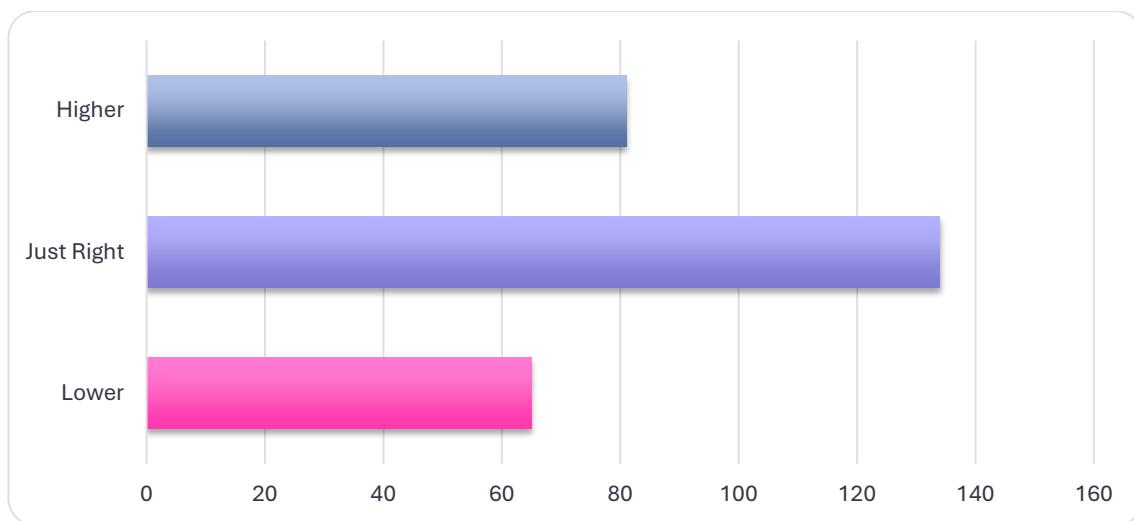
Question 52:

Do you think there should be a different split of housing unit sizes than identified in the Local Housing Needs Assessment for Market Housing?

Responses

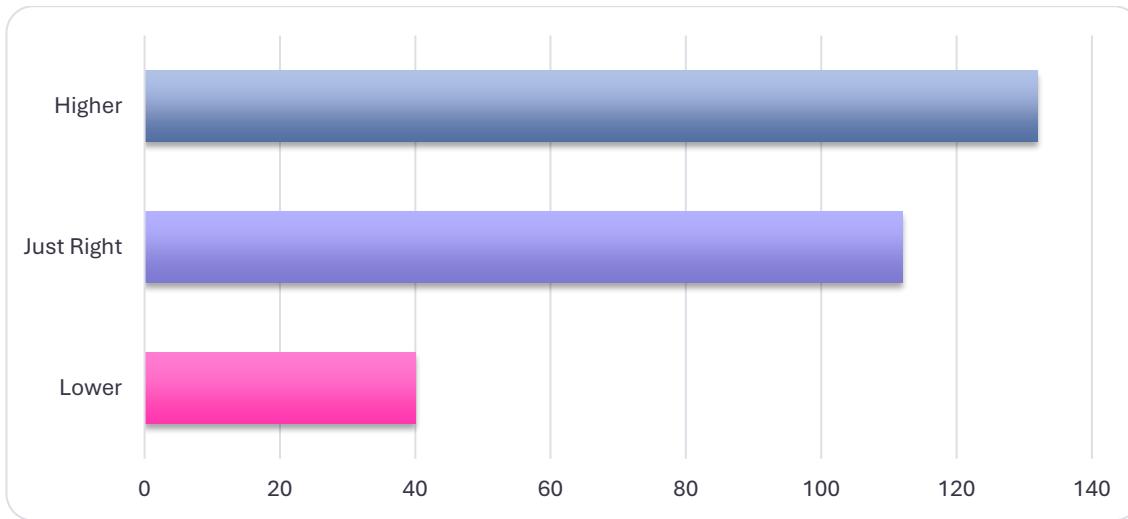
Split – market housing – 1 Bed

The majority of the respondents (134) agree that on new housing sites 5% of the market housing should be provided as 1-bedroomed.



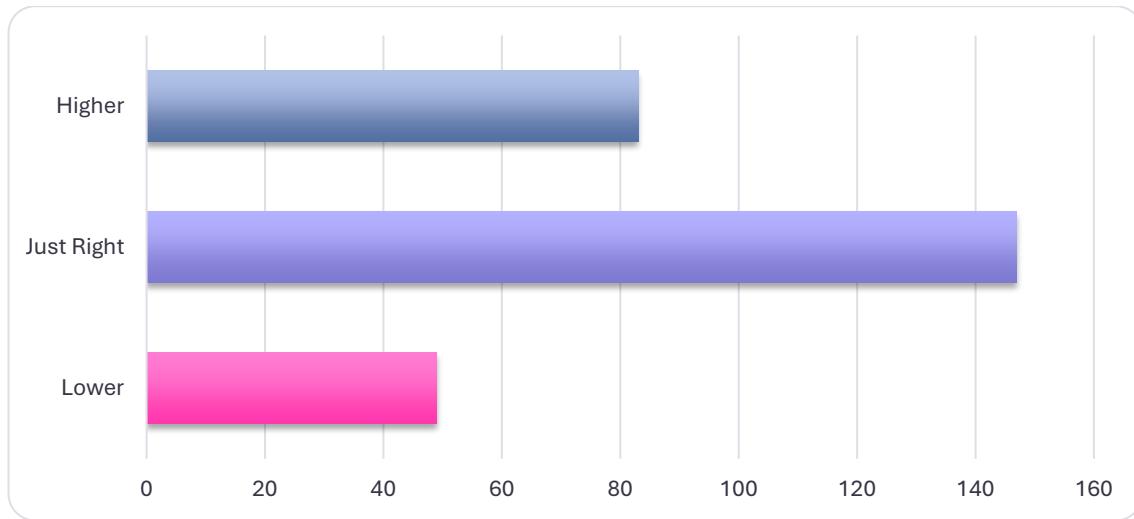
Split - market - 2 Bed

The graph below shows that the majority of the respondents consider that there should be a higher provision of 2-bed dwellings than 18% identified in the Local Housing Needs Assessment.



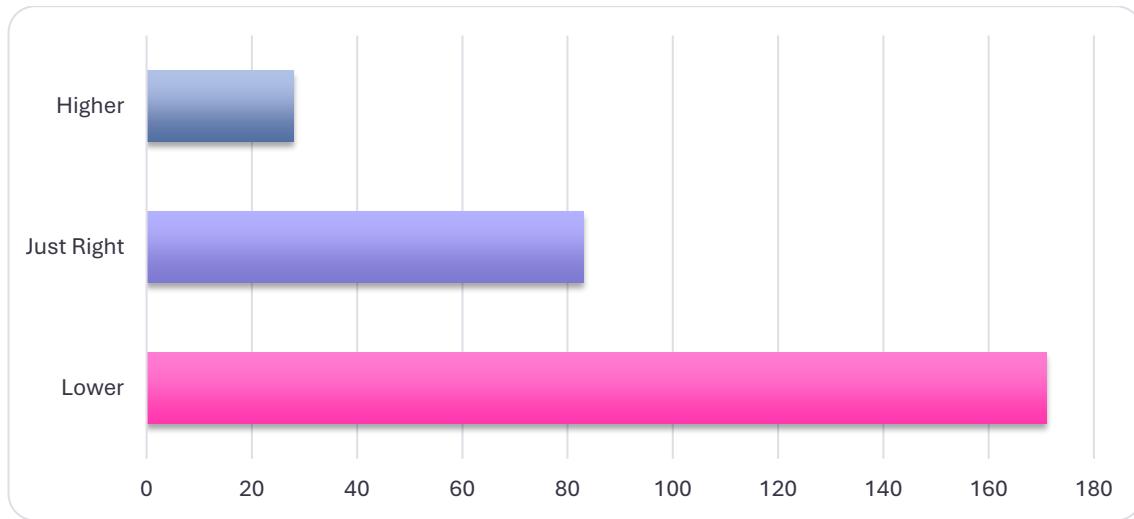
Split - market - 3 Bed

Most of the respondents to the question consider that the requirement for development to provide 41% of new dwellings as 3-bedrooms to be just right.



Split - market - 4+ Beds

In terms of the requirement of housing development to provide 34% of dwellings as 4-bedrooms a large majority of the respondents (171) consider that this is too high and should be lower.



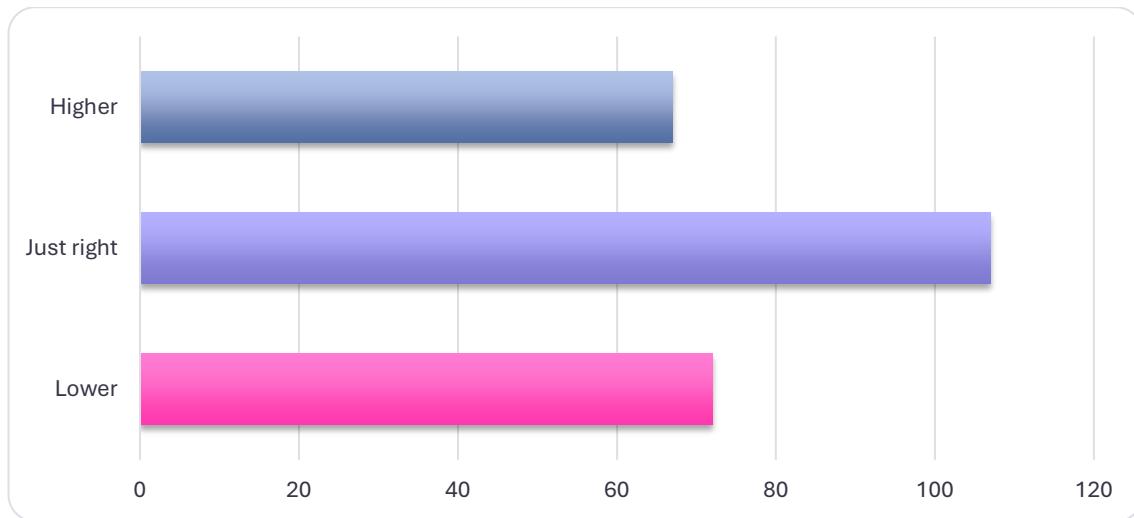
Question 53:

Do you think there should be a different split of housing unit sizes than identified in the Local Housing Needs Assessment for Affordable Housing?

Response

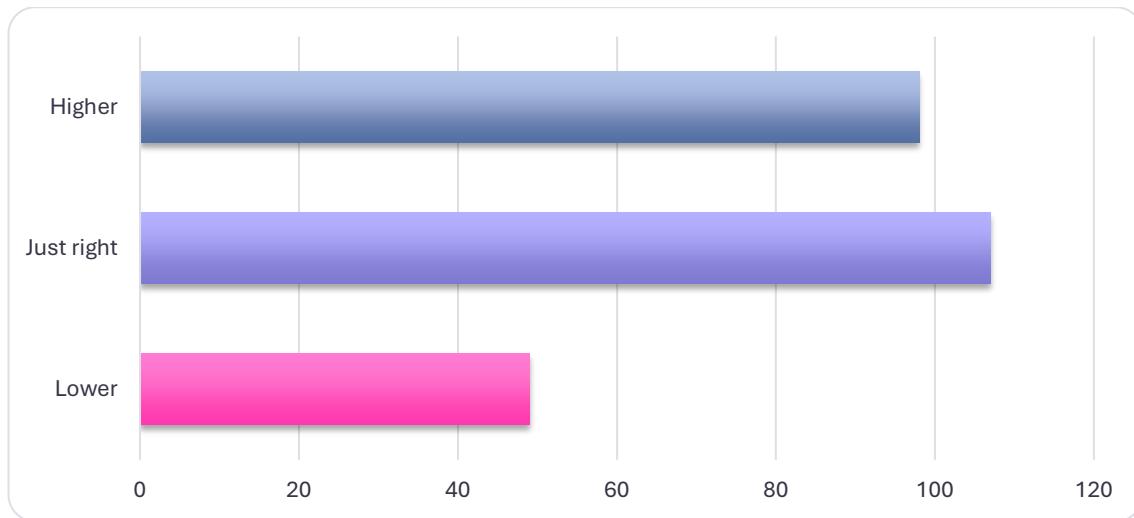
Split - affordable – 1 Bed

The majority of the respondents consider that 21% of the affordable housing provision from new housing development as identified in the Local Housing Needs Assessment should be for 1-bed dwellings to be just right. A significant proportion, however, think it should be lower (72), with 67 who think that it should be higher.



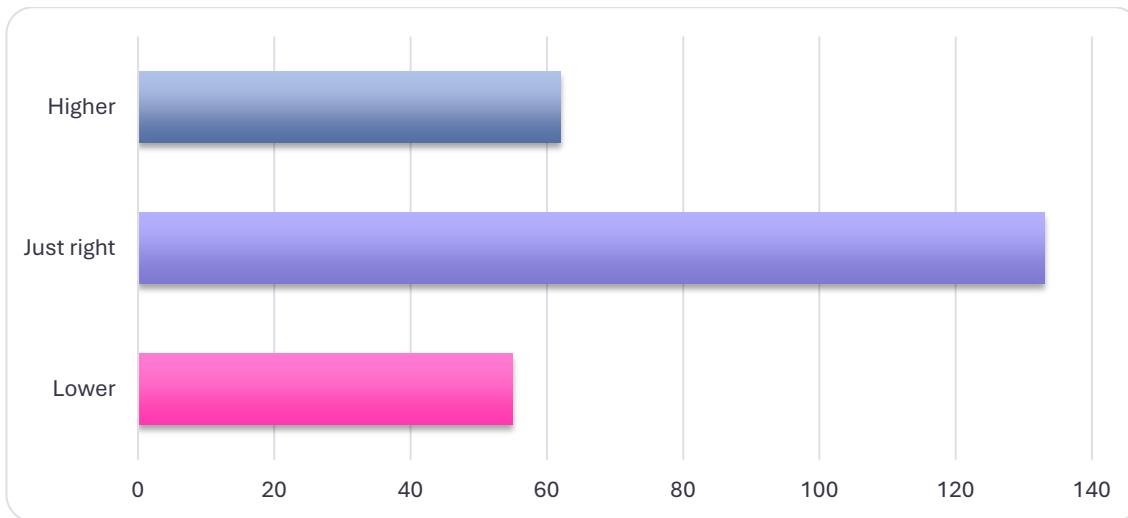
Split – affordable - 2 Bed

The majority of the respondents (107) consider that 34% of the affordable housing provision from new housing development should be for 2-bed dwellings to be just right. A significant proportion, however, consider that it should be higher (98).



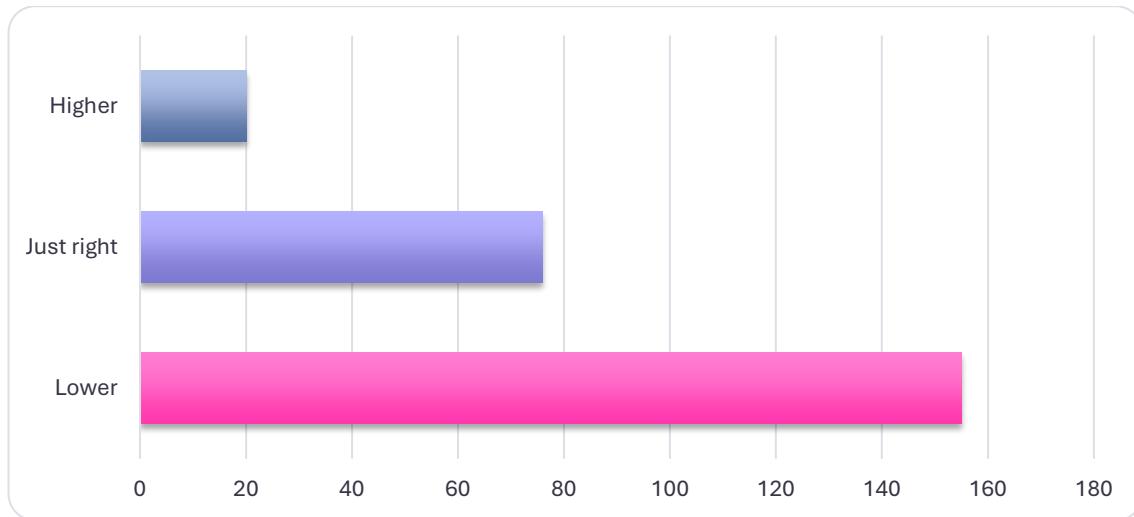
Split – affordable - 3 Bed

The majority of the respondents (133) consider that 33% of the affordable housing provision from new housing sites should be for 3-bed dwellings to be just right.



Split – affordable - 4 Bed

The overwhelming majority of the respondents to the question (155) consider that the requirement for affordable housing to provide the new dwellings as 4-bedroomed should be lower than 12%.



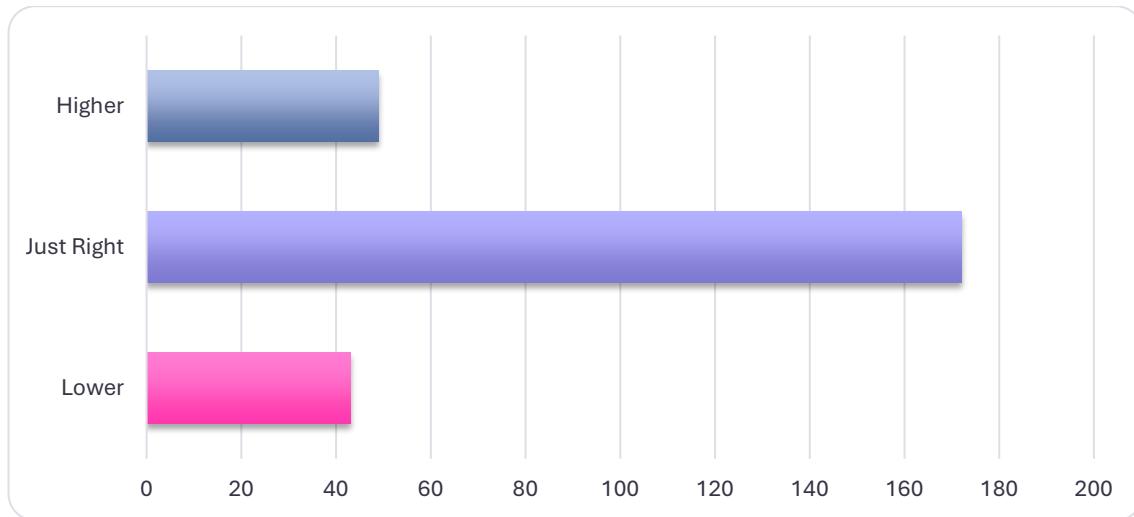
Question 54:

What proportion of new housing stock should be built to enhanced accessibility standards?

Response

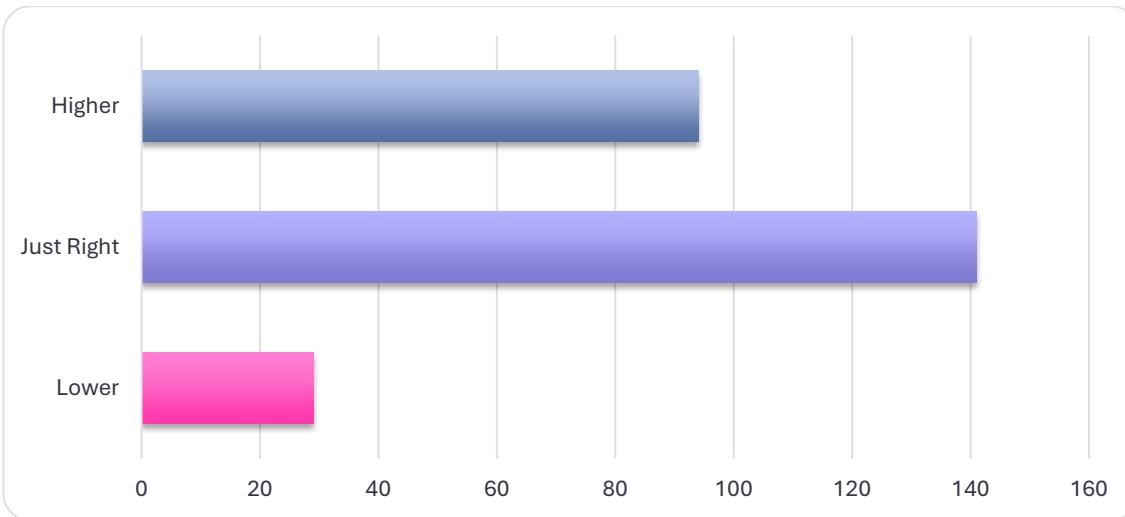
Accessible Housing - M4 (2) - Adaptable

The majority of the respondents (172) to the question expressed support that all-new housing should meet the M4(2) accessibility standards. Although the requirements to meet Part M4(2) is no longer necessary as it will become a mandatory requirement through the Building Regulations.



Accessible Housing - M4 (3) - Wheelchair Adapted. Evidence Benchmark is 8%

The majority of the respondents think that building 8% of all housing on new sites to meet the higher M4(3) wheelchair user standard is about right. A significant number, however, do consider that it should be even higher.

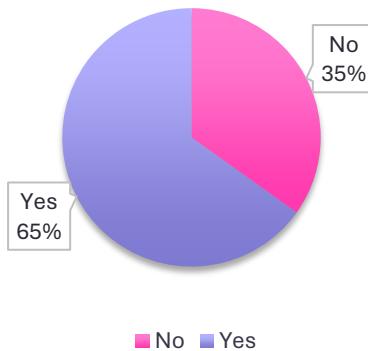


Question 62:

Do you think that new development should be designed to support working from home?

Response

As can be seen from the chart below a significant 65% of respondents agree that new development should be designed to support working from home.

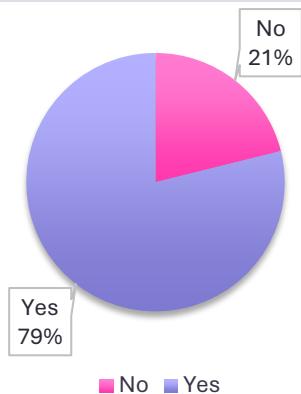


Question 63:

Do you think new facilities that aid working near home should be supported?

Responses

A large majority 79% agree new facilities that aid working near home should be supported.

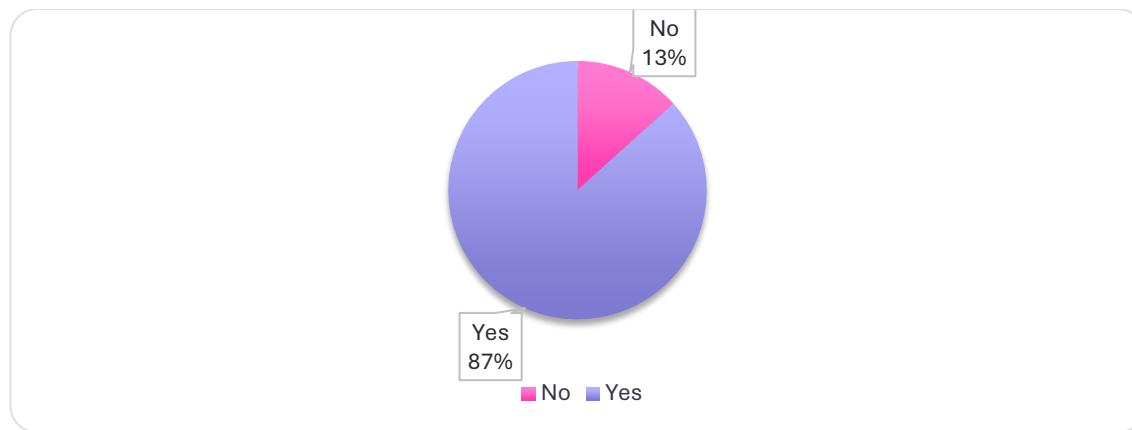


Question 66:

Would you support the development of a new facility to help improve local skills, and the ability of residents to improve their opportunities to find work locally?

Response

A large majority of 87% of respondents to the question would support the development of a new facility to help improve local skills, and the ability of residents to improve their opportunities to find work locally.

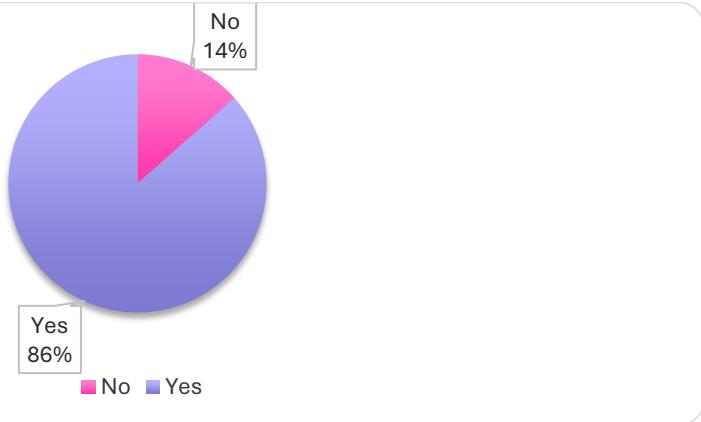


Question 70:

Do you support greater protection for individual shops outside of local centres and parades?

Responses

Eighty-six percent of respondents support greater protection for individual shops outside of local centres and parades compared to 14% who do not agree.

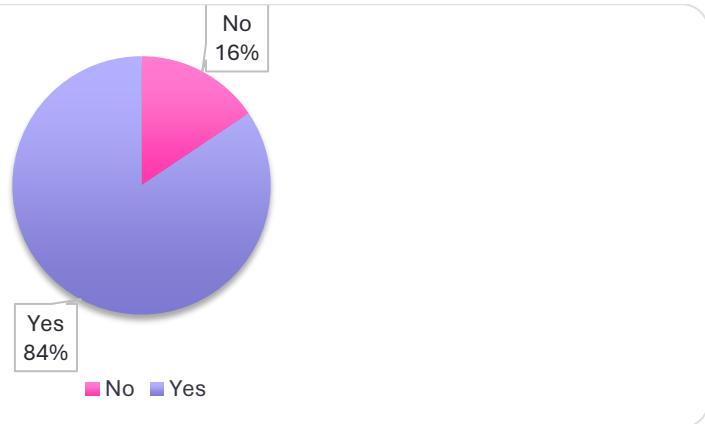


Question 74

Do you support a more diverse range of uses in town centres, for example offices which would support the daytime economy, and flats, restaurants and bars that would support the evening economy?

Response

As can be seen from the chart the overwhelming percentage (84%) of respondents support a more diverse range of uses in town centres, for example offices which would support the daytime economy, and flats, restaurants and bars that would support the evening economy.

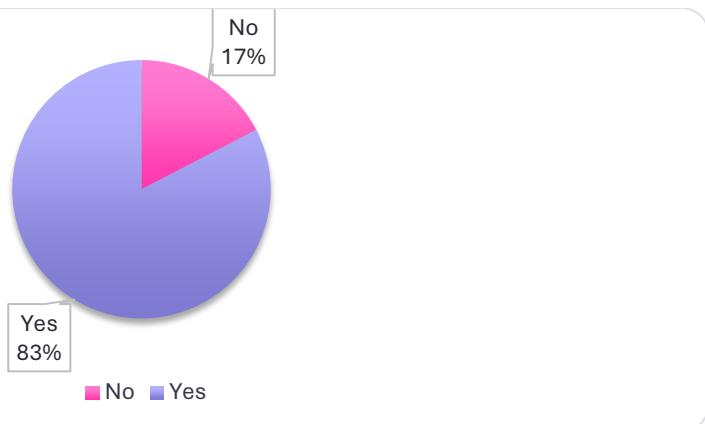


Question 84:

Do you feel existing homes/buildings in the borough should be retrofitted to improve their energy efficiency?

Response

There was strong support expressed for improving the energy efficiency of existing buildings.

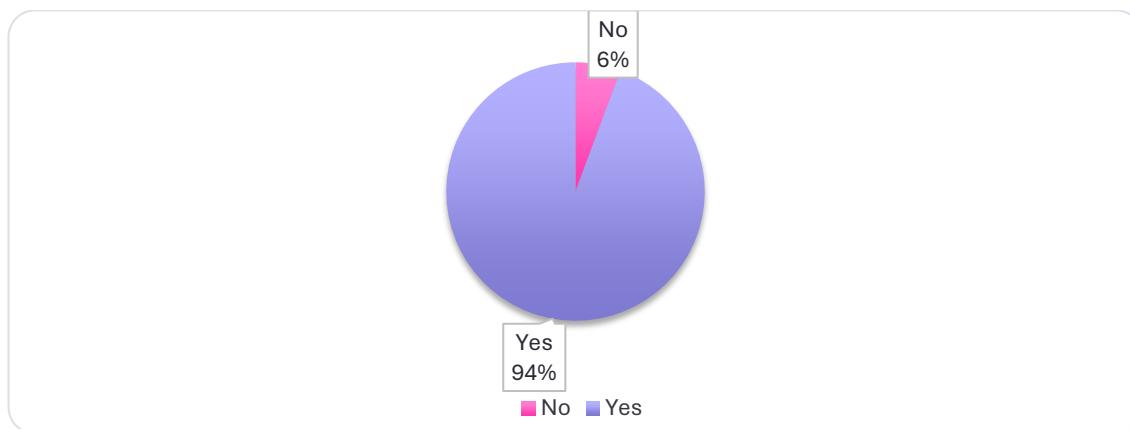


Question 85:

Should the plan apply the optional requirement for increased water efficiency in new development?

Response

94% of the respondents to the question agree that policies should apply the optional requirement for increased water efficiency. Only 6% do not agree.

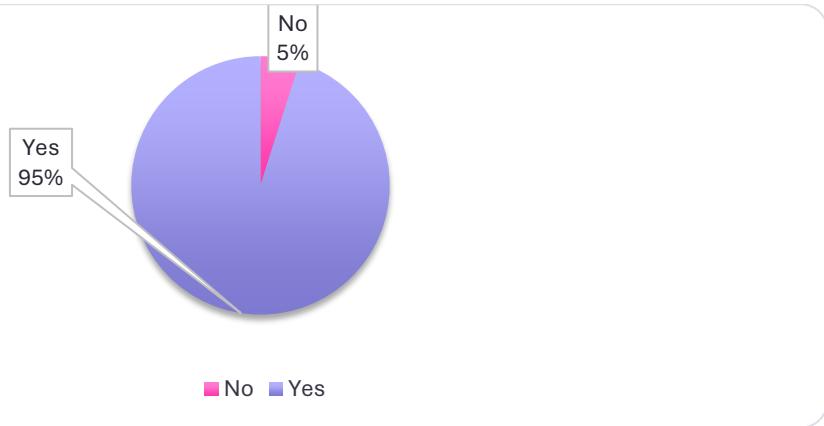


Question 86

Do you feel that Sustainable Drainage Systems (SuDS) should be incorporated into smaller, as well as major developments?

Response

There is strong support for the use of SUDS in small and large development proposals (95%).

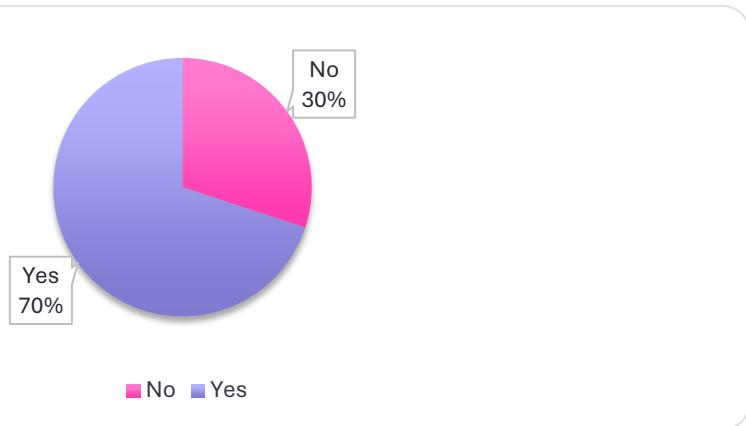


Question 94:

Are there opportunities to improve areas of Castle Point's landscape?

Response

70% of the respondents consider that there are opportunities to improve the landscape in Castle Point, whereas 30% do not.

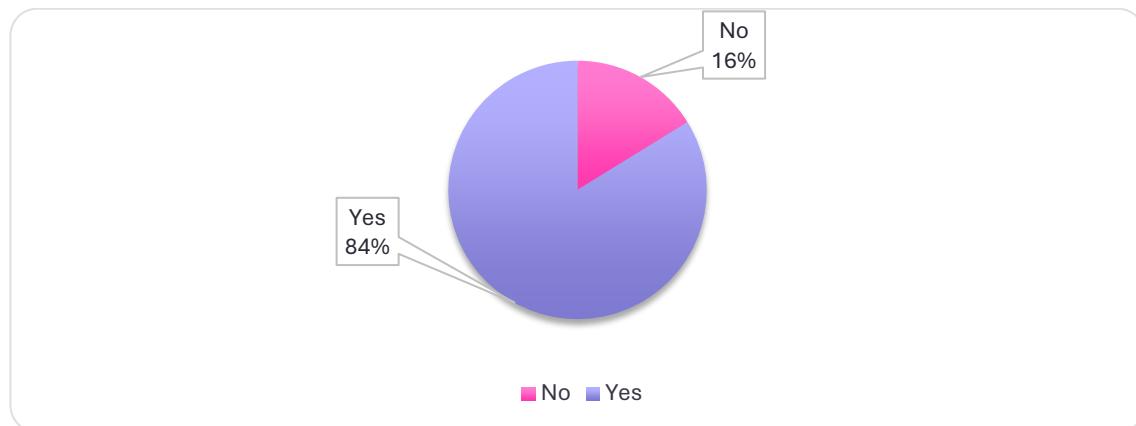


Question 97:

Would you support seeking a higher than 10% Biodiversity Net Gain requirement?

Response

The majority of respondents endorse increasing the Biodiversity Net Gain (BNG) requirement above 10%, highlighting its importance for ecosystem preservation and future resilience (see summary of key issues in table above).

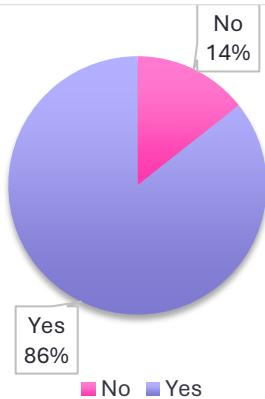


Question 98:

Would you support the introduction of an Urban Greening Factor seeking to increase biodiversity in urban areas?

Response

Strong support from respondents for the Urban Greening Factor for its potential benefits to urban biodiversity

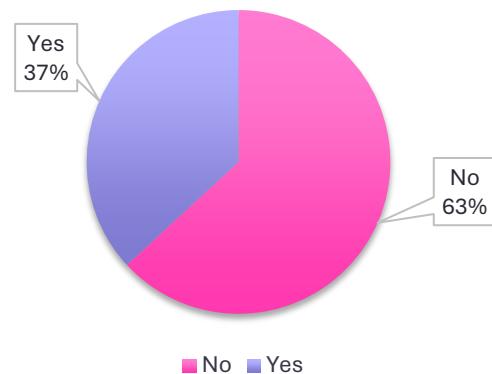


Question 108

Should land be allocated for large scale renewable energy generation?

Response

Overall, there is general support for the allocation of large-scale renewable energy generation, however, there also appears to be significant opposition at 37% of respondents (see table of summary of key issues above)

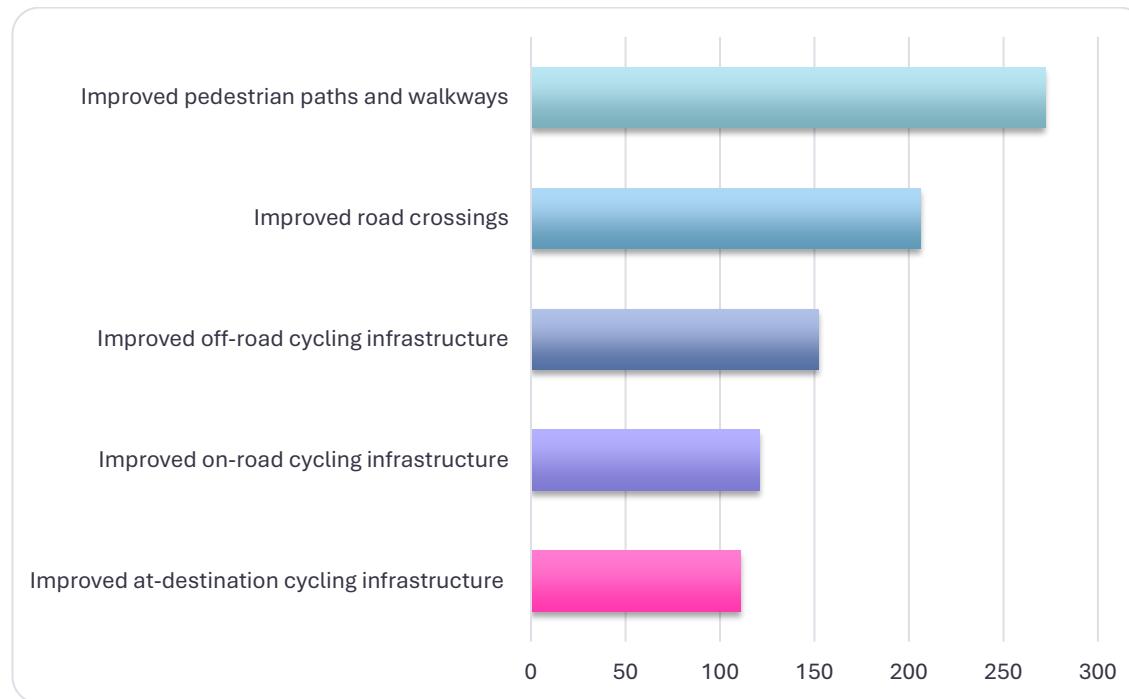


Question 110:

Which of the following active travel infrastructure improvements would you be in favour of? (Please select your choices)

Response

The majority of respondents favoured improvements to pedestrian paths and walkways (272) followed by improved road crossings.

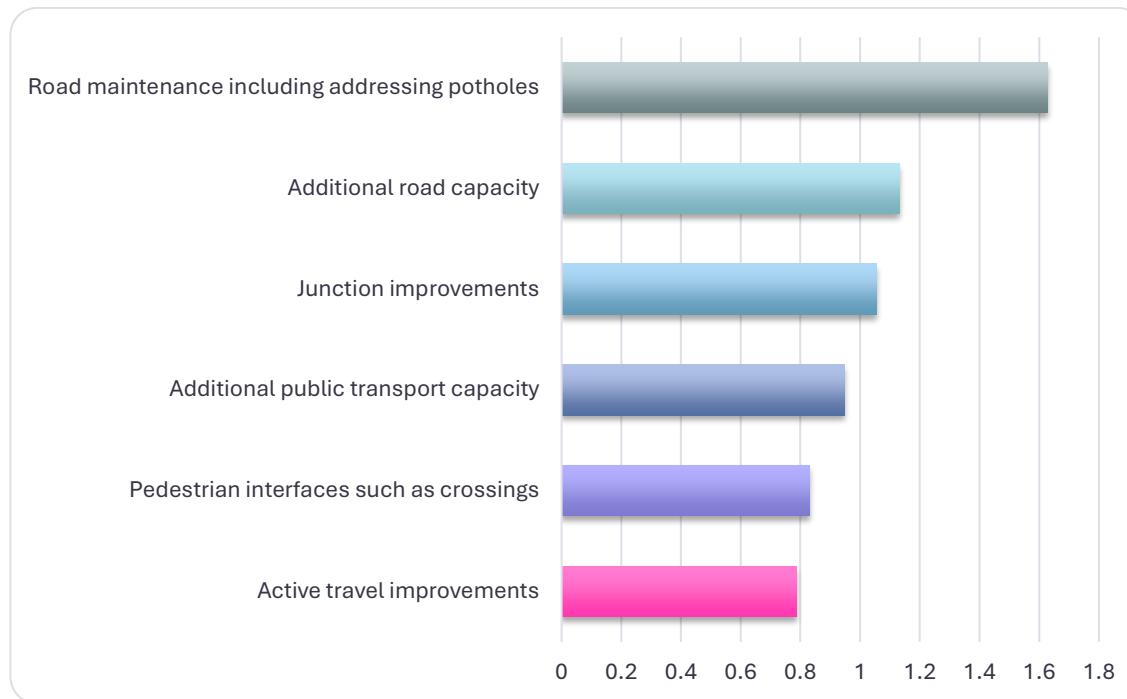


Question 112

What type of road infrastructure needs to be improved over the Plan period? Please rank the following 'Benefits afforded by increasing development density' into your order of preference (1 being your most preferred option):

Response

Road maintenance including addressing potholes was ranked by the majority of respondents as the top priority for road infrastructure, followed by increased capacity and junction improvements.



Question 116

Please rank these bus improvements in your order of preference (1 being your most preferred option):

Response

Improved bus frequency was ranked by the majority of respondents as the preferred option for bus services, followed by wider network and route improvements, and starting earlier and finishing later respectively.

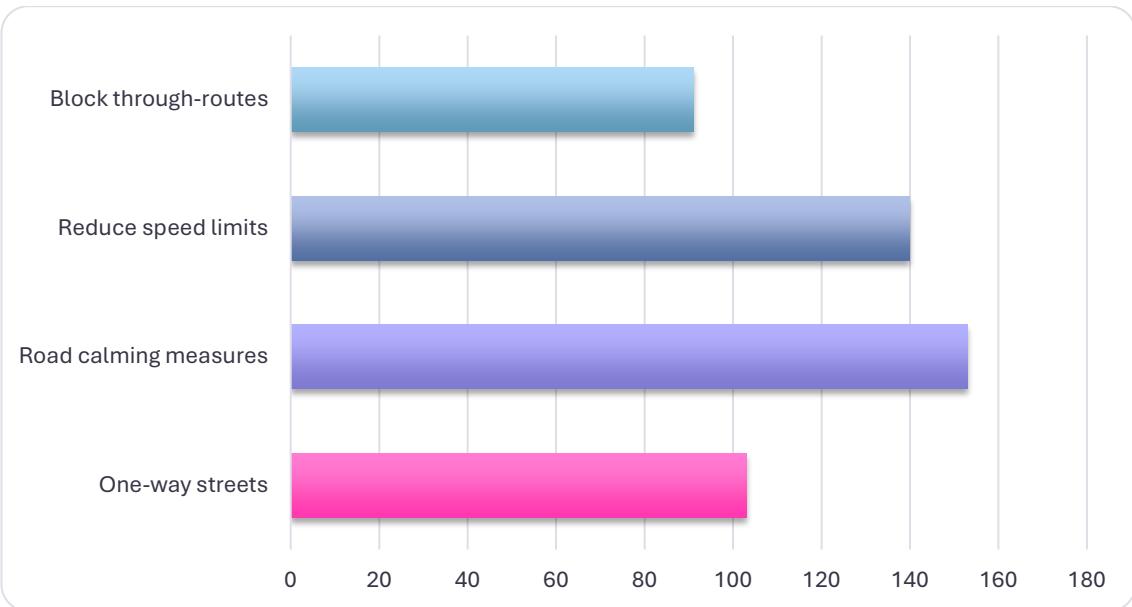


Question 119:

What measures do you feel would help to reduce the impacts of rat-running on unsuitable routes in the borough?

Response

In order to help to reduce the impacts of rat-running on unsuitable routes in the borough road calming measures (153) was seen as the most effective, followed by reducing speed limits.



7.3 Regulation 19 Consultation: Main Issues from 'Residents and Other Stakeholders' and Council Responses

These are a selection of the issues considered to be more significant from 'Residents and Other Stakeholders' from the Regulation 19 stage consultations (Aug-Sept 2025 and Oct-Dec 2025). The full list of representations is published separately and should also be referred to.

Plan Section/ Policy / Paragraph	Topic/Specific Issues Raised	Council Response/Action
Duty to Cooperate	Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	This is addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.
Castle Point's Spatial Strategy and Strategic Policies: Policy SP3 Meeting Development Needs	Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth.	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).
	Not achieving government housing target	<p>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</p> <p>Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p>Within the NPPF Paragraph 11 section b (a) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. This includes situations where:</p> <ul style="list-style-type: none"> the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting

Plan Section/ Policy / Paragraph	Topic/Specific Issues Raised	Council Response/Action
		<p>the overall scale, type or distribution of development in the plan area 7 ; or</p> <ul style="list-style-type: none"> 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. <p>Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding.</p> <p>Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that "Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations..."</p> <p>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)."</p>
	<p>Consideration of All Sites: Not all sites have been considered and assessed</p>	<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p>
	<p>North West Thundersley should have been included. 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.</p>	<p>North West 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.</p>
	<p>Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities.</p>	<p>Support noted</p>

Plan Section/ Policy / Paragraph	Topic/Specific Issues Raised	Council Response/Action
	However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply.	
	Concerns with lack of access to the Borough, and Canvey in particular.	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.
Green Belt /Grey Belt	Green Belt: Welcome decision not to include green belt sites. Green Belt land provides flood attenuation, biodiversity, and recreational value. Its protection is essential.	Support noted Green Belt/Grey belt covered under policy GB2.
Canvey Island	The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its constraints (Environmental, flood Risk, hazardous industries, infrastructure constraints. and lack of emergency access).	Noted. Responses on individual constraints detailed below.
	The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution.	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

Plan Section/ Policy / Paragraph	Topic/Specific Issues Raised	Council Response/Action
		development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.
	Canvey: Concerns over flood risk.	<p>Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to 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.</p> <p>Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p>
	Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for.	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.
	Emergency Planning: Two COMAH sites on Canvey, one of which supplies aviation fuel to the RAF, this must surely qualify as a potential terrorist target.	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.

Plan Section/ Policy / Paragraph	Topic/Specific Issues Raised	Council Response/Action
	<p>Hazardous installations and port-related activities: Inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation. The Plan is not based on proportionate evidence and fails to justify its spatial strategy.</p> <p>Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies.</p>	<p>As set out in Plan paragraph 8.28 'Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development. Both installations have HSE consultation zones identified around them, in which it is expected that other development is controlled to limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new development is proposed'</p> <p>The current HSE consultation zones are indicated on the policies map. The plan doesn't propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site.</p> <p>Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE.</p>
	Concerns about access off the island in the event of an emergency.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).

Plan Section/ Policy / Paragraph	Topic/Specific Issues Raised	Council Response/Action
		The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/
Protecting our Biodiversity and Landscape	Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical.	Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. Wildlife addressed in Policies (particularly ENV1-6) supported by a range of supporting evidence including the Habitats Regulations Assessment, Local Wildlife Site Review, South Essex Green and Blue Infrastructure Study, Essex Local Nature Recovery Strategy, Living Landscape reports, Biodiversity Report, Strategic Biodiversity Assessment.
Infrastructure	Concerns with infrastructure capacity and pressure to accommodate growth, particularly on Canvey.	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).
	Policy INFRA3: Health & wellbeing An HIA should also be required for developments of Park Homes	Mod proposed as follows f. Requiring a Health Impact Assessment (HIA) on all development sites delivering: i. 50 or more dwellings or park homes ,
Promoting Sustainable Transport	Concerns about highways congestion worsening as a result of development	The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4

8. Statutory Consultees and Duty to Cooperate Bodies

8.1 These are organisations and agencies required by law to be consulted.

8.1 Regulation 18 Consultation: Main Issues from 'Statutory Consultees and Duty to Cooperate Bodies' and Council Response

These are the main issues from 'Statutory Consultees and Duty to Cooperate Bodies' from the Regulation 18 stage consultation which took place between 22 July and 16 September 2024.

Consultee	Specific Issues Raised	Council Response/Action
Anglian Water	<ul style="list-style-type: none"> Anglian Water support the vision of the plan in terms of future proofing the borough and the whole of the area against the impacts of Climate Change. Anglian Water are supportive of planning strategies that prioritise nature based solutions wherever possible to manage flood and coastal erosion risk. Anglian Water supports the use of SuDS and the betterment in terms of managing surface flood risk and increased resilience on infrastructure. Anglian Water supports the improvement of the green and blue infrastructure within the public realm. Anglian Water will not comment on potential sites until they are allocations. Anglian Water supports creating exemplary environmental sustainability in new developments. 	Comments are noted and support is welcomed. The policies within the plan take account of this support and the Council looks forward to working collaboratively with Anglian Water.
Basildon Borough Council	<p>Basildon support the options for growth approach, but the Council must consider the new proposed standard methodology figure set out in the proposed NPPF changes.</p> <p>Basildon cannot accommodate any of Castle Point's housing need.</p> <p>While meeting housing need is challenging, Castle Point must consider demand for employment spaces.</p> <p>Basildon believes that if Northwest of Thundersley is chosen as a development option, the ongoing work between the</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need in line with the Standard Methodology. However, achieving this in full within our administrative boundary remains challenging due to the constraints. We will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context.</p> <p>We appreciate Basildon Borough Council's input and look forward to ongoing dialogue to ensure that housing and strategic needs are met in a sustainable and balanced manner.</p>

Consultee	Specific Issues Raised	Council Response/Action
	councils must continue to ensure there are no detrimental impacts on Basildon.	
Brentwood Borough Council	<p>Brentwood supports the vision of the plan.</p> <p>Brentwood believes the council should attempt to meet the proposed standard methodology figure set out by the new government.</p> <p>Brentwood is not capable of taking any of Castle Points unmet housing need.</p> <p>Brentwood supports higher density development to meet housing need.</p> <p>Brentwood support the inclusion of a net zero policy.</p> <p>Brentwood supports large scale renewable energy generation as long as careful consideration is given over the harm to the environment.</p>	<p>Comments are noted and support is welcomed. The policies within the Plan take account of this support and the Council looks forward to working collaboratively with Brentwood Borough Council.</p> <p>Brentwood's inability to meet housing need from Castle Point is noted. The Council will aim to meet housing need as far as possible considering its size and existing constraints.</p> <p>Castle Point Council remains committed to preparing a Plan that addresses housing need in line with the Standard Methodology. However, achieving this in full within our administrative boundary remains challenging due to the constraints. We will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context.</p>

Consultee	Specific Issues Raised	Council Response/Action
Chelmsford City Council (CCC)	<p>CCC recognise constraints on developable land in Castle Point. CCC would expect Castle Point Council to meet their housing need in full through the Local Plan to meet the Standard Methodology Housing Need.</p> <p>A Green Belt review should also be undertaken and further urban capacity/intensification assessment.</p> <p>CCC would expect the provision for Gypsies and Travellers to be met within the administrative boundary of Castle Point and must take account of the on-going evidence base work.</p> <p>CCC to actively engage with Castle Point on strategic cross-boundary matters in regard to housing, employment, transport infrastructure, education, Gypsy, Traveller's and Travelling Showpeople, and Essex Coast RAMS.</p>	<p>Castle Point Council acknowledges CCC's recognition of the constraints on developable land within Castle Point borough. In response to CCC's expectations.</p> <ol style="list-style-type: none"> Meeting Housing Need Castle Point Council remains committed to preparing a Plan that addresses housing need in line with the Standard Methodology. However, achieving this in full within our administrative boundary remains challenging due to the constraints. We will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. Green Belt Review and Urban Capacity Assessment A Green Belt Review has been undertaken as part of our evidence base, along with a comprehensive urban capacity and intensification assessment. Castle Point Council is committed to ensuring the provision of adequate accommodation for Gypsies, Travellers, and Travelling Show people. A Gypsy and Traveller Accommodation Assessment has been prepared to support the Plan and to assess needs and we have addressed these within our administrative boundary, taking into account the unique constraints of our area. Strategic Cross-Boundary Matters Castle Point Council values constructive engagement with CCC and other stakeholders on strategic cross-boundary matters. We recognize the importance of

Consultee	Specific Issues Raised	Council Response/Action
		<p>coordinated approaches to housing, employment, transport infrastructure, education, and the Essex Coast RAMS. We will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>5. We appreciate CCC's input and look forward to ongoing dialogue to ensure that housing and strategic needs are met in a sustainable and balanced manner.</p>
Environment Agency	<p>The EA highlighted challenges due to flood risk within Castle Point, particularly on Canvey Island and Benfleet.</p> <p>Recommended incorporating a flood resilience requirement for all new developments.</p> <p>Support the implementation of a 19-metre buffer zone around flood defence infrastructure.</p> <p>Recommend a holistic riverside strategy approach.</p> <p>The EA encourage a BNG policy that exceeds the 10% minimum and advocates for measures to protect SSSIs and locally designated ecological sites.</p> <p>The EA supports a brownfield first approach.</p> <p>The EA suggests conducting a new Water Cycle Study due to concerns over increasing demand for water supply.</p> <p>The EA stressed the importance of coordinating with Anglian Water to ensure Water Recycling Centre's have capacity to support increased demand</p>	<p>We welcome the support of the Environment Agency:</p> <ol style="list-style-type: none"> Flood Risk Challenges in Castle Point We acknowledge the flood risk concerns highlighted by the EA, particularly regarding Canvey Island and Benfleet. The Council is committed to prioritizing flood resilience. This had been recognized through appropriate policies and development requirements. Incorporating Flood Resilience Requirements The recommendation to incorporate flood resilience requirements for all new developments is welcomed. The Council will explore opportunities to establish robust policy provisions that mandate flood-resilient designs, considering site-specific risks and climate change projections. 19-Metre Buffer Zone Around Flood Defence Infrastructure The Council supports the EA's recommendation to implement a 19-metre buffer zone around flood defence infrastructure. This has been incorporated in Policy C9 – Land at the Point, Canvey Island; Policy SD1 - Tidal

Consultee	Specific Issues Raised	Council Response/Action
		<p>Flood Risk Management and Policy SD2 - Non-Tidal Flood Risk Management</p> <p>4. Holistic Riverside Strategy Approach Policy ENV2 – Coastal & Riverside Strategy. Working with the Environment Agency, ECC as Lead Local Flood Authority, neighbouring authorities, the community and other relevant stakeholders the Council will prepare a Riverside Strategy.</p> <p>5. Biodiversity Net Gain (BNG) Policy A policy has been developed in the Plan dealing with BNG: Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain. The requirement is for 10% BNG on all applicable brownfield sites; and 20% on all applicable greenfield sites. The Environment Act 2021 mandates that most developments should deliver at least 10% BNG, but local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% BNG on sites to improve contribution to the local nature recovery network identified through the Local Nature Recovery Strategy for Essex.</p> <p>6. Brownfield First Approach The Council shares the EA's support for a brownfield-first approach to development. This aligns with our objectives to prioritize sustainable land use and minimize the environmental impact of new developments.</p> <p>7. Water Cycle Study We note the EA's concerns regarding increasing water</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>supply demand and the recommendation for a new Water Cycle Study. The Council with South Essex authorities will explore the feasibility of updating the study to ensure water resource capacity.</p> <p>8. Coordination with Anglian Water</p> <p>The Council agrees on the importance of collaboration with Anglian Water to address capacity issues at Water Recycling Centres. Early engagement with Anglian Water will be prioritized to align infrastructure planning with development proposals.</p>
Essex Fire and Rescue	<p>Essex Fire and Rescue support:</p> <p>Following the Essex Design Guide in regard to access for fire service vehicles, along with sprinklers and suppression systems within developments and suitably placed hydrant placements.</p> <p>Recommend planning for emergency responses and utilising community spaces within the borough to build community resilience.</p> <p>Recommend aiming to ensure safe development design, effective resource access and a proactive approach to risk management.</p>	<p>The emerging Castle Point Design Code has informed the design policy requirements for achieving well designed places. Development proposals should also have regard to the Essex Design Guide and supplementary guidance.</p> <p>Policy D2 – Design on Larger Sites and within Premium Sustainability areas requires development to:</p> <ul style="list-style-type: none"> - Provide communal and public amenity spaces; - Enhance permeability and improve access to services in the local area.
Historic England	Historic England emphasise the plan should integrate conservation of the historic environment to align with sustainable development.	<p>Comments are noted and have been taken into account</p> <p>Policy on Conserving and Enhancing the Historic Environment (D9) requires development proposals affecting a heritage asset (either designated or non-designated) to conserve, and where appropriate enhance, the heritage assets and their setting.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>They have strong objections to specific sites including GB2 and GB8, with Historic England recommending not proceeding with GB8 at all.</p> <p>They recommend creating site policies that preserve and enhance heritage assets and including scheduled monuments in local heritage maps.</p> <p>They also recommend ongoing collaboration with local conservation officers and archaeologists.</p>	<p>No sites within the Green Belt have been allocated for development.</p>
Marine Management Organisation	<p>The MMO suggests that the plan should reference the South East Marine Plan.</p> <p>The MMO recommends including the intertidal and marine elements in policy discussions where applicable.</p> <p>They encourage the use of materials from MMO's previous training sessions to aid in marine planning</p>	<p>Comments noted reference is made to the South East Marine Plan in justification to Policy C3 - Canvey Port Facilities</p> <p>It should be noted that as these facilities are adjacent to the coast, the South East Inshore Marine Plan is also relevant in respect of any development which affects the seaward side of the defences. Consideration needs to be given on how any such changes impact on the marine environment or its use, including any conflicts arising with other users. Separate consents from the Marine Management Organisation will be required for certain types of activity.</p>
National Highways	<p>Commend the plan for addressing SRN impacts in the IDP baseline review.</p> <p>They also support adopting adaptive planning frameworks to manage long-term traffic impacts.</p> <p>National Highways support prioritising sustainable transport to minimise SRN impacts</p>	<p>Response to National Highways' Comments on Strategic Road Network (SRN) Impacts in the Infrastructure Delivery Plan Baseline Review.</p> <p>Castle Point Borough Council appreciates National Highways' recognition of our approach to addressing SRN impacts within the Infrastructure Delivery Plan baseline review. We acknowledge the importance of robust planning to mitigate</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>Although there are no SRN's within Castle Point, development could impact upon the A1089, A12, A13 and M25.</p> <p>There are concerns over potential traffic impacts on these roads and thus NH encourage Castle Point to adopt vision led planning.</p>	<p>long-term traffic impacts and support the adoption of adaptive planning frameworks, as highlighted in your response.</p> <p>While Castle Point does not have SRNs within its boundary, the council is mindful of the potential traffic impacts on nearby routes, including the A1089, A12, A13, and M25 and the need to mitigate. This has been reflected in the transport policies of the plan Policy T5 - Highway Impacts: Where necessary, the Council will secure planning conditions, highway works (s278) and/or financial contributions (s106) to deliver mitigation works necessary to mitigate the impacts of development.</p> <p>This reinforces the importance of collaborative efforts to address cross-boundary transport challenges. Castle Point will continue to engage with National Highways and other stakeholders to ensure that development proposals consider and mitigate impacts on the SRN, supporting the delivery of sustainable growth across the borough and beyond.</p>
Natural England	<p>Summary of key issues raised by NE:</p> <ul style="list-style-type: none"> Biodiversity and Green Infrastructure: Calls for integrating biodiversity goals, ambitious Biodiversity Net Gain (BNG) targets, and robust green/blue infrastructure strategies, including adopting the Essex Local Nature Recovery Strategy. Climate Change Mitigation and Adaptation: Emphasizes the importance of flood risk management, sustainable urban drainage systems (SuDS), and urban greening for climate resilience. 	<p>The Council acknowledges the detailed feedback provided by Natural England. The insights and recommendations shared have been taken into account in shaping the policies of the publication version of the Plan.</p> <p>The Council has carefully considered all the key issues raised, including:</p> <ol style="list-style-type: none"> Biodiversity and Green Infrastructure: A policy has been developed in the Plan dealing with BNG: Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain. The requirement is for 10% BNG on all applicable

Consultee	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> Development Standards: Advocates for net-zero housing, improved public/active transport, and sustainable design codes that enhance environmental and human-centric urban planning. Protected Areas and Wildlife: Focuses on conserving protected sites, expanding wildlife corridors, and mitigating impacts of developments on sensitive ecosystems. Sustainable Land Use: Stresses protecting agricultural land, adopting sustainable practices, and enhancing soil quality for ecosystem services and food production. Public Engagement and Accessibility: Supports inclusive policies to improve access to nature and promote public health benefits through green spaces and active travel infrastructure. Renewable Energy: Recommends careful planning to minimize environmental impacts of renewable energy projects like solar farms. 	<p>brownfield sites; and 20% on all applicable greenfield sites.</p> <p>The Environment Act 2021 mandates that most developments should deliver at least 10% BNG, but local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% BNG on sites to improve contribution to the local nature recovery network identified through the Local Nature Recovery Strategy for Essex.</p> <ol style="list-style-type: none"> Climate Change Mitigation and Adaptation: Policies promoting sustainable drainage systems (SuDS), flood risk management, and urban greening have been incorporated to ensure resilience to climate change impacts. Sustainable Development Standards: The plan sets ambitious standards for net-zero housing, improved transport connectivity, an urban design. Protection of Designated Sites and Wildlife: Stronger policies have been included to protect designated biodiversity sites, buffer sensitive habitats, and expand wildlife corridors in line with the Lawton principles (see section 18 on Protecting our Biodiversity and Landscape) Land Use and Soil Quality: The importance of safeguarding best and most versatile agricultural land and maintaining soil quality is reflected in policies

Consultee	Specific Issues Raised	Council Response/Action
		<p>promoting sustainable land use (Policy ENV6 – Best and Most Versatile Agricultural Land).</p> <p>6. Renewable Energy Development: The plan emphasizes carefully planned renewable energy projects, ensuring they minimize environmental impacts and align with broader sustainability goals.</p> <p>7. Community Access to Nature: The Accessible Green Space Standards (AGS) have informed policies aimed at increasing public access to high-quality green spaces, promoting health and well-being.</p> <p>Castle Point Borough Council remains committed to collaborating closely with Natural England to ensure the plan delivers meaningful environmental and sustainability outcomes.</p>
NHS Integrated Care Board (ICB)	<p>The ICB's include emphasising reducing health inequalities, focusing on wider determinants of health, supporting aging populations, mental health, and promoting healthy lifestyles.</p> <p>The ICB welcomes Castle Point's vision but recommends stronger wording to emphasise reducing health inequalities as a priority, aligning with the ICB's own goals.</p> <p>The ICB believes that development in Castle Point will increase demands on local health services, which already face capacity constraints.</p> <p>They support the incorporation of community hubs and public services to try and assist with capacity constraints.</p>	<p>The Council acknowledges the comments and feedback provided by NHS ICB. The insights have been taken into account in shaping the policies of the publication version of the plan.</p> <p>The Council has carefully considered all the key issues raised. Policy Infra3 – Improving Health and Wellbeing sets out:</p> <p>The Council will work to improve the health and wellbeing of residents by:</p> <p>Working in partnership with the NHS and Public Health to ensure residents can access high quality primary and secondary health care services and that new and improved</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>The board also supports accessible housing for wheelchair users.</p> <p>The ICB advocates for planning policies that allow healthcare funding flexibility, enabling funds to be allocated based on emerging needs as developments progress.</p> <p>The ICB supports inclusive design across Castle Point to ensure safety and accessibility for people with diverse sensory and mobility needs.</p>	<p>services are put in place, where appropriate, to serve the growing population;</p> <p>Seeking mitigation towards new or enhanced health facilities from developers where new housing development would result in a shortfall or worsening of health provision;</p> <p>Supporting the NHS, Social Services and Public Health to deliver a service which meets the needs of residents within the local community;</p> <p>Requiring a Health Impact Assessment (HIA) on all development sites delivering 50 or more dwellings.</p> <p>Policy Infra5 - Indoor Leisure and Sports recognizes that access to opportunities for sport and physical activity is important to the health and well-being of communities.</p> <p>To increase participation in physical activity, the Council will seek to secure new and improved indoor leisure and sports facilities.</p> <p>Policy Hou4 – Specialist Housing Requirements.</p> <p>All new homes will be delivered in accordance with accessibility standards as follows:</p> <p>10% of all new homes will be built to standard M4(3) wheelchair user.</p>

Consultee	Specific Issues Raised	Council Response/Action
Southend City Council	<p>Southend and Castle Point share an administrative boundary, strategic transport connections, employment ties, and housing market overlaps, particularly concerning the South Essex housing market.</p> <p>Southend recognises the challenge of meeting local housing need and highlights that Southend itself may not meet its own housing need due to physical constraints.</p> <p>Southend supports prioritising brownfield land for development but stresses that any Green Belt release should follow a thorough review, in line with the NPPF.</p> <p>Objections are raised to the potential release of Green Belt site GB8 (Land South of Hadleigh), which serves as a buffer between Southend and Hadleigh.</p> <p>Southend emphasises the importance of selecting larger sites capable of supporting infrastructure rather than numerous small, fragmented sites, which may strain existing infrastructure, particularly in Southend.</p> <p>Collaboration with Castle Point and Essex County Council is encouraged to address infrastructure and transport concerns.</p> <p>Southend formally requests that Castle Point consider accommodating some of Southend's unmet housing needs due to the city's spatial limitations.</p>	<p>Castle Point acknowledges the shared administrative boundary and strategic ties with Southend City Council, including transport, employment, and housing market overlaps in the South Essex area.</p> <p>Housing Need and Green Belt:</p> <p>Castle Point shares Southend's commitment to prioritising brownfield development but recognises the challenge of balancing housing need with protecting the Green Belt. Any release of Green Belt land, including site GB8, has been the subject to a comprehensive review in accordance with the NPPF. GB8 is not proposed for allocation.</p> <p>Infrastructure and Site Selection:</p> <p>Castle Point agrees on the importance of selecting sustainable sites. The approach to meeting development needs in the Borough focuses on urban renewal and regeneration, seeking to identify development sites in sustainable locations which make the best use of brownfield land. However, this is not at the detriment of the character and quality of place of the existing towns and communities.</p> <p>Collaboration and Unmet Housing Needs:</p> <p>Castle Point is committed to ongoing collaboration with Southend and Essex County Council to address shared concerns, including infrastructure and transport. While acknowledging Southend's request for assistance with unmet housing needs, Castle Point must also consider its own</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>housing pressures, spatial constraints, and the significant challenges of meeting local needs within the borough.</p> <p>Castle Point remains committed to constructive engagement through the Duty to Cooperate process to address strategic planning matters effectively.</p>
Essex County Council		<p>Castle Point Borough Council (CPBC) appreciates Essex County Council's (ECC) comprehensive feedback and acknowledges the importance of collaborative planning to meet the needs of our communities effectively. Below is CPBC's response addressing each key issue raised.</p>
	<p>Affordable Extra Care Housing ECC advocates for a minimum 60-unit affordable extra care scheme per development for sustainability. This aligns with ECC's "Essex Market Position Statement for Extra Care," ensuring feasibility and scalability in affordable housing provisions.</p>	<p>CPBC recognises the need for sustainable affordable extra care housing. However, the Council considers that it would be more appropriate to assess the viability of schemes on a case-by-case basis. Factors such as local need, site constraints, and funding opportunities should be considered to ensure an appropriate balance between scale and deliverability. While 60 units might be a useful benchmark, it should not be an inflexible minimum requirement.</p>
	<p>Housing Mix and Tenure ECC recommends that Castle Point updates its housing mix and tenure regularly based on demographic needs, emphasizing a diverse mix of units across both private and affordable sectors. The mix should prioritize housing for</p>	<p>CPBC is committed to maintaining a dynamic and inclusive housing mix that reflects demographic changes. The Plan incorporate policies to prioritise housing for families, older adults, and those with disabilities as part of the mix (Hou4).</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>families, older adults, and individuals with disabilities, with provisions for flats and bungalows.</p> <p>ECC supports a greater proportion of M4(3) homes (wheelchair-accessible housing) and calls for more developments to consider independent living options for older adults and those with specific needs.</p>	<p>The Policy in the plan on Specialist housing (Hou4) is based on the evidence from the Essex Supported and Specialist Housing Needs Assessment (Housing LIN ECC, May 2025) shows that in Castle Point there is an unmet need for about 130 fully wheelchair-accessible dwellings (M4(3)) in 2024, rising to some 158 households by 2044.</p> <p><u>Independent Living</u></p> <p>CPBC supports ECC's call for enhanced independent living options.</p> <p>Policy Hou4 – Specialist Housing Requirements. The Council will support:</p> <ul style="list-style-type: none"> a. Proposals that contribute towards the delivery of 1,056 retirement/sheltered homes and 594 extra care units for older people over the plan period in locations with good access to shops and services. b. Proposals that contribute towards the delivery of 138 residential care beds and 139 extra care beds over the plan period.
	<p>Green Belt Analysis and Education Provision</p> <p>ECC highlights the importance of analysing Green Belt sites to inform the spatial strategy options as well as identifying potential future education provision, especially in conjunction with housing plans.</p>	<p>CPBC acknowledges the necessity of assessing Green Belt sites carefully to inform the spatial strategy while safeguarding valuable green spaces. Collaboration with ECC will ensure that education provision, particularly in growth areas, is integrated into strategic planning.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>Freight, Logistics, and Transport</p> <p>ECC emphasises the need for freight and logistics considerations, suggesting that the plan accommodates future HGV traffic through main road improvements, especially for industrial access via strategic A roads. It recommends inclusion of designated HGV routes within Castle Point's Road network and suggests considering the Lower Thames Crossing and Fairglen Interchange in traffic plans.</p> <p>ECC highlights the importance of integrating bus services and infrastructure early in the planning process, with alignment to the "Bus Back Better" and Bus Service Improvement Plans, focusing on sustainable and accessible routes to serve new developments.</p> <p>They support LTN/120-compliant off-road cycle routes, especially where feasible, to ensure cycling safety and convenience. They recommend improving legibility through wayfinding and accessible routes for people of all ages.</p> <p>ECC stresses that all road and transport improvements should include features that consider the needs of residents with disabilities, promoting inclusive design for pedestrians, cyclists, and other non-vehicle users.</p>	<p>The Council will support the local transport authority in securing road improvements and associated junctions including to accommodate HGV traffic. The requirements are set out in the policies in Sustainable Transport chapter of the Plan (Policy T2 - Highway Improvements)</p> <p>CPBC shares ECC's commitment to sustainable transport solutions. This has been taken into consideration and proposed policies in the Plan prioritise the early integration of bus services, compliant cycle routes, and inclusive transport infrastructure.</p> <p>The Plan contains Policy T3 - Active Travel Improvements where all new development should be planned around a network of safe and accessible active travel routes, where dedicated traffic free links make walking and cycling the best choice for day-to-day trips supporting healthy and active lifestyles. This requirement should also be reflected in the master plans developed in response to this Plan.</p>
	<p>Employment Area Safeguarding</p> <p>ECC calls for safeguarding employment areas, such as the Manor Trading Estate and Charfleets, from conflicting uses like residential development, which may hinder existing</p>	<p>Employment Area Safeguarding</p> <p>CPBC agrees on the need to protect employment areas, such as Manor Trading Estate and Charfleets, from incompatible uses. In terms of employment need, data on employment</p>

Consultee	Specific Issues Raised	Council Response/Action
	industrial operations. This would help retain critical employment zones.	<p>growth indicates that there will be a potential surplus of employment land over the plan period. Whilst the Council does not wish to lose employment provision, it believes that this surplus combined with the poor quality of the existing employment areas provides an opportunity to secure mixed use renewal of employment land to provide both new homes and better-quality employment and commercial floor space.</p> <p>The Council will therefore require master plans for each of West Canvey, Manor Trading Estate and the Rayleigh Weir/Stadium Way Estate to bring about new development in the latter part of the plan period. In the period whilst these master plans are prepared, the existing designations for land in these areas will be retained to allow for a planned approach to any significant change.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>Health Impact Assessments (HIAs) ECC suggests conducting HIAs for employment sites over 1,000 sqm to ensure they support health and wellbeing, in line with Essex's Healthy Places Checklist, ensuring that developments account for the wellbeing of the workforce.</p> <p>ECC encourages flexible residential layouts that facilitate work-from-home arrangements, reflecting new work trends that emerged post-pandemic. This includes designing homes with adaptable spaces for remote work.</p>	<p>CPBC values ECC's emphasis on HIAs for large employment sites and has incorporated this approach to ensure workforce wellbeing and alignment with the Essex Healthy Places Checklist. Policy Infra3 – Improving Health and Wellbeing require a Health Impact Assessment (HIA) on all development sites delivering:</p> <p>50 or more dwellings; all development in Use Class C2 (Residential Institutions); all non-residential developments delivering 1,000 square metres or more gross internal floor space; and 'sui generis' hot food takeaways.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>Green Infrastructure (GI) and Biodiversity ECC advocates for policies mandating GI in new developments, promoting biodiversity net gain, recreation, and active travel. It suggests creating interconnected green spaces that serve ecological, recreational, and aesthetic functions.</p> <p>ECC recommends embedding Local Nature Recovery Strategies (LNRS) to enhance biodiversity, create green corridors, and support habitat connectivity, incorporating strategies like SANGs (Suitable Alternative Natural Greenspaces) within larger development schemes.</p> <p>ECC emphasises using the National Green Infrastructure Framework to assess GI needs. It supports measures like green corridors for wildlife, SuDS, and integration of active travel and public open spaces within developments.</p>	<p>CPBC supports the integration of green infrastructure and biodiversity net gain across developments. Local Nature Recovery Strategies, and measures like green roofs and pollinator-friendly landscaping. These are requirements supported by many of the policies of the draft Castle Point Plan.</p>
	<p>Educational Facilities and Provision ECC emphasises the importance of cumulative demand assessment for education infrastructure, particularly for early years and childcare provisions in growing areas like Benfleet and Hadleigh. This would ensure sufficient capacity to support growing residential areas.</p> <p>ECC's latest Childcare Sufficiency Assessment indicates gaps in early years capacity, prompting the need for childcare provisions in residential planning. ECC recommends co-locating early years facilities with primary schools to optimize resource use.</p> <p>ECC highlights that developer contributions should be directed towards educational facilities, especially in areas with</p>	<p>The need for educational facilities of all type resulting from housing growth has been recognized in the Plan. Policy Infra2 – Education, Skills and Learning</p> <p>Where a development proposal, either individually or cumulatively with other development, increases demand for education facilities beyond those available within the local area, development will be required to make proportionate contributions to support capacity improvements to education infrastructure.</p> <p>The Council will work with ECC and other education providers to deliver improvements to schools and other educational facilities which improve:</p>

Consultee	Specific Issues Raised	Council Response/Action
	projected population growth and housing development, ensuring primary and secondary capacity is adequate.	The quality and choice of education and learning opportunities in the Borough.
	<p>Water Efficiency and Drainage Recognising Essex's water-stressed status, ECC recommends setting a high-water efficiency standard for all new developments, targeting eighty litres per person per day for residential use. This would reduce overall water demand, particularly in drought-sensitive areas.</p> <p>ECC emphasises the need for Sustainable Drainage Systems (SuDS) in all new developments to control surface water runoff, suggesting features like rainwater harvesting and ponds to manage flood risk. The focus is on natural drainage solutions to mitigate flood impacts, especially in flood-prone areas like South Benfleet.</p>	<p>This issue has been considered in the Plan. Policy SD9 – Water Supply and Waste Water</p> <p>All new residential developments should achieve a water efficiency standard of no more than 90 litres per person per day. Where it can be demonstrated that this is not feasible part G2 and regulation 36(2)(b) of the Buildings Regulations will apply.</p> <p>The recent Future Homes Hub Water Efficiency Report (April 2024), sets recommended water efficiency targets for 2025 and 2035 for seriously water stressed areas including Essex from 90-80.</p> <p>Further application of these enhanced standards to the levels proposed for 2035 will be considered as part of a review of this plan, considering the potential viability implications.</p> <p>CPBC supports ECC's recommendation to implement Sustainable Drainage Systems (SuDS) to address surface water runoff and mitigate flood risks in areas like Canvey Island and South Benfleet. This has been established as a requirement in a number of the proposed policies in the Plan.</p>
	<p>Flood Risk and Former Landfill Sites ECC calls for comprehensive flood risk assessments for all developments within critical drainage areas (CDA), especially those near Canvey Island and South Benfleet, where flooding is a persistent challenge.</p>	CPBC shares ECC's commitment to flood risk management. Comprehensive flood risk assessments will be required for developments within critical drainage areas. These issues are covered in policies SD1 - Tidal Flood Risk Management and Policy SD2 - Non-Tidal Flood Risk Management.

Consultee	Specific Issues Raised	Council Response/Action
	<p>ECC recommends safeguarding and expanding Local Wildlife Sites (LoWS) within development areas, supporting biodiversity by establishing buffers and linking habitats. This approach supports the goals of Essex's Local Nature Recovery Strategy.</p>	<p>New development proposals within an area at risk of fluvial flooding, or within an area at risk from surface water flooding in a 1 in 100 year event, will be considered against the sequential test set out in the NPPF.</p> <p>Through Policy ENV4 - Local Wildlife Sites the Council seeks the conservation and enhancement of Local Wildlife Sites (LoWS) and Potential Local Wildlife Sites (PLoWS).</p> <p>The Council will support proposals which ensure the active conservation and enhancement of biodiversity interest of Local Wildlife Sites and potential Local Wildlife Sites.</p> <p>Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain: In determining applications for planning consent the Council will seek to secure nature recovery and biodiversity net gain</p>
	<p>Health and Wellbeing</p> <p>ECC recommends that Castle Point's Local Plan incorporate a strategic Health and Wellbeing policy, guided by Essex's Health and Wellbeing Strategy. This would support the creation of healthy, accessible, and socially inclusive environments.</p> <p>ECC promotes designs that are inclusive for individuals with disabilities, advocating for dementia-friendly elements within transportation and public spaces. This aligns with ECC's commitment to creating age-friendly and supportive community environments</p> <p>For larger developments, ECC suggests integrating HIAs to ensure new infrastructure supports the physical and mental</p>	<p>CPBC recognises the importance of a strategic Health and Wellbeing policy and has incorporated a policy on Health and Wellbeing guided by principles from Essex's Health and Wellbeing Strategy.</p> <p>Policy T3 - Active Travel Improvements: All new development should be planned around a network of safe and accessible active travel routes. Policy requires proposals for additional active travel routes through open spaces to be supported, subject to their design to providing safe and inclusive access.</p>

Consultee	Specific Issues Raised	Council Response/Action
	health of residents, particularly in areas with historically high health inequalities.	
	<p>Waste Management</p> <p>ECC, as the Waste Disposal Authority, stresses the need for safeguarding waste operations within Castle Point's Waste Local Plan. It underscores the importance of maintaining capacity and operations at waste sites in line with Essex's Waste Local Plan policies.</p> <p>ECC advises on monitoring developments within 250m of former landfill sites (e.g., Canvey and Hadleigh), ensuring these areas remain safe post-remediation and do not pose risks to nearby developments.</p>	<p>CPBC acknowledges ECC's role as the Waste Disposal Authority and will safeguard waste operations within the Borough, ensuring alignment with the Waste Local Plan.</p> <p>ECC is the waste disposal authority for Essex. The Essex and Southend on Sea Waste Local Plan is the Essex Local Plan that deals with landfill sites. The plan is to reduce reliance on landfill and encourage recycling. ECC is also responsible for safeguarding waste infrastructure and development management policies for waste.</p> <p>Castle Point will consult ECC on proposals in the Borough likely to affect former landfill sites.</p> <p>Castle Point Borough Council looks forward to continued engagement with Essex County Council to develop a Local Plan that reflects shared priorities and delivers sustainable, inclusive, and high-quality outcomes for our communities.</p>
The Port of London Authority	Improvements to the seafront area and ensuring good access to training jobs and services.	<p>Thank you for the comments which are welcomed.</p> <p>Seafrot Entertainment Area Canvey Seafront Entertainment Area's role as a vibrant leisure destination to be retained and enhanced has been recognized in Policy Canvey Seafront</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>The PLA would be keen to see the continued promotion of the boroughs existing riverside terminals.</p> <p>Development proposals adjacent to these terminals should take into account the noise, vibration impacts and highways access.</p> <p>The PLA support the reference that both facilities are identified as Hazardous Sites under health and safety regulations and that it is important that new development is located away from these facilities to help manage risk to life and property.</p> <p>The PLA recommends that the policies map for the plan includes the zones of impact created by the riverside terminals.</p>	<p>Entertainment Area (C2). Within the allocated seafront entertainment area, commercial and leisure development proposals that can be demonstrated to support the tourist industry will be permitted, subject to compliance with all other relevant policies in this Plan.</p> <p>In relation to improved access Policy C5 - Improved Access to and around Canvey Island. The Council will undertake a feasibility study to identify options for improving access to, from and within Canvey Island, including its wider strategic implications. This will be prepared in collaboration with key partners including ECC.</p> <p>The Council recognizes the importance of the borough's existing riverside terminals and agree with the need for their continued promotion as critical assets for the local economy and sustainable transport.</p> <p>Development proposals adjacent to the terminals will incorporate comprehensive assessments of noise, vibration impacts, and highway access to ensure compatibility with the operational requirements of the terminals. This is reflected in Policy Canvey Port Facilities (C3).</p> <p>Within the allocated Port Related Facilities Area applications for development will normally be permitted providing the development does not cause significant harm to the landscape or environmental assets, having regard to the scale of existing development on the site.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>Blue Infrastructure</p> <p>The PLA welcomes continued protection and enhancement of the borough's blue infrastructure</p>	<p>The Policy emphasizes the importance of managing risks by ensuring that new developments are appropriately located to protect life and property.</p> <p>The Policy and justification acknowledge the port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. Both installations have HSE consultation zones identified around them, in which it is expected that other development is controlled to limit unnecessary harm to life and property.</p> <p>We agree that including the zones of impact created by the riverside terminals on the Policies Map would enhance the clarity and utility of the plan. The zones are shown on the revised Policies Map.</p> <p>Blue Infrastructure</p> <p>We welcome the PLA's support for the protection and enhancement of the borough's blue infrastructure. The draft plan includes policies to ensure the sustainable management and improvement of waterways, which contribute to biodiversity, flood resilience, and recreation.</p> <p>We appreciate your constructive input and will continue to collaborate to ensure that the borough's riverside and seafront areas are developed responsibly and sustainably.</p>

Consultee	Specific Issues Raised	Council Response/Action
Department of Education	<p>The DFE recommends that the next stage of the Local Plan should seek to provide further detail about the site-specific requirements for schools.</p> <p>The DFE also recommends retaining a degree of flexibility about site specific requirements for school places.</p> <p>The recommendations include specific requirements for developer contributions for enlargements to existing schools and the provision of new schools.</p> <p>Furthermore, requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements.</p> <p>The DFE would like to be included as early as possible in discussions on potential site allocations, as there could be pipeline school projects within the borough which may be appropriate for specific designation.</p>	<p>The educational infrastructure needs resulting from new development have been considered in the Plan.</p> <p>Policy: Policy Infra2 – Education, Skills and Learning.</p> <p>Development will be required to make proportionate contributions to support capacity improvements to education infrastructure. The Council will work with ECC and other education providers to deliver improvements to schools and other educational facilities.</p> <p>The Infrastructure Delivery Plan establishes where new educational facilities are required based on the growth identified within this Plan. Developers will be expected to provide contributions for additional school / early years.</p> <p>In relation to both planned and unplanned growth regard will be given to the “Essex County Council Developers’ Guide to Infrastructure Contributions” in order to determine the level of contributions likely to be sought.</p> <p>The DFE is on the consultees database and will be consulted on the Regulation 19 version of the Plan which will include specific site allocations and any educational needs.</p>
Leigh Town Council	<p>Leigh Town Council are appalled that the Salvation Army have put forward their land for consultation.</p> <p>They believe the site is completely unsuitable for development due to factors including impact on the community of Leigh and it being a site of natural beauty that has been enjoyed by families across Leigh and Hadleigh for generations.</p> <p>LTC has concerns over the site’s potential effects on Leigh and the wider Southend area.</p>	<p>The site (GB8) is not proposed for allocation.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need</p>

Consultee	Specific Issues Raised	Council Response/Action
	They also believe the Green Belt should be protected and maintained	<p>to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p>

8.2 Regulation 19 Consultation: Main Issues from 'Statutory Consultees and Duty to Cooperate Bodies' and Council Response

These are a selection of the issues considered to be more significant from 'Statutory Consultees and Duty to Cooperate Bodies' from the Regulation 19 stage consultations (Aug-Sept 2025 and Oct-Dec 2025). These are organisations and agencies required by law to be consulted. The full list of representations is published separately and should also be referred to.

Consultee	Specific Issues Raised	Council Response/Action
Anglian Water	<ul style="list-style-type: none"> Support policies SP1 and SP4 Request Policy C1 should include appropriate SuDS through urban greening to provide overall betterment for the existing community. Policy C4 should require a surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy. The supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed. Policy C6: Request their Canvey Island water recycling centre (WRC) is mainly excluded from the Green Lung designation on the Policies Map to ensure that future operational or engineering works required in relation to maintaining or improving our essential wastewater infrastructure is not constrained by the designation. Consistency issues highlighted whereby some policies stipulate the proposal must be compliant with all other relevant policies of this Plan, while other policies omit this statement. Policy SD3: AW seeks certain amendments as set out in the corresponding actions listed. 	<p>Statement of Common Ground agreed and signed</p> <ul style="list-style-type: none"> Minor addition to Policy C1 proposed, highlighting the inclusion of appropriate SuDS to manage surface water flood risk in the town. Minor additions to Policy C4 and supporting text proposed to address AW's points, including reference to a surface water drainage strategy and SuDS. Minor adjustment to Green lung boundary on policies map proposed to address AW's concern. Consistency regarding statements on compliance with other policies proposed to be addressed by removing said sentences on the understanding that the Plan is to be read as a whole. Clarification to Policy SD3 added that development which seeks to connect to the public sewerage network requires a drainage strategy to demonstrate that the surface water hierarchy has been followed. Minor addition to supporting text of Policy SD6 recognising need for consideration of proximity to wastewater infrastructure facilities AW support policy SD9

Consultee	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> Policy SD6: AW express concern over possible development proposals in proximity to wastewater infrastructure. Policy SD9 Water Efficiency standards 	
Basildon Borough Council	<p>Not compliant with necessary legislation or positively prepared since it doesn't meet standard method housing figure.</p> <p>Queries the approach of urban renewal and regeneration with focus on protecting and enhancing the natural environment based on evidence including LNRS</p> <p>Considers that the local plan could have used some Green Belt sites for development which were highlighted in the DAC study July 2025.</p> <p>IDP based on growth scenarios from reg 18 Plan.</p> <p>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</p>	<p>Statement of Common Ground prepared.</p> <p>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</p> <p>Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p>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:</p> <ul style="list-style-type: none"> the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. <p>Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding.</p> <p>Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that "Plan-making bodies should consider constraints when</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>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)."</p> <p>The Green Belt Assessment July 2025 reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for development as outlined in the Housing Capacity Topic Paper August 2025.</p>
Brentwood Borough Council	<p>Considers the local plan is not legally compliant or sound as housing strategy does not meet all of the housing need calculated by the standard methodology</p> <p>Acknowledges CP's physical and environmental constraints.</p> <p>Considers that there is limited technical evidence to justify lower housing delivery and no full transparent assessment of alternative spatial strategies including one that would meet the full standard methodology housing need.</p> <p>Suggest that further evidence and testing required – propose the cumulative impact on transport.</p>	<p>Statement of Common Ground prepared.</p> <p>Housing delivery has been rigorously evidenced through the Green Belt Assessment July 2025, 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.</p> <p>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</p>

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	<p>Supports the following Plan policies and principles:</p> <p>Requiring masterplans for allocated sites, heritage policy, strategic development of employment land policy , gypsy and traveller accommodation policy, policy for strategic development of employment land, policy for new floorspace in town centres, Town Centre and Retail policy, Hot Food Takeaway policy, landscape policy, Developer Contributions policy..</p> <p>Broadly supports CPBC Transport Strategy but adequate mitigation needs to be in place A127 and A129 to support growth.</p> <p>Broadly supports enhanced active travel and public transport but must ensure that impacts of growth on sustainable transport networks are considered and mitigated if necessary.</p> <p>Broadly supports enhanced active travel and public transport but must ensure that impacts of growth on sustainable transport networks are considered and mitigated if necessary.</p>	<p>urban intensification and regeneration sufficient sites to 6,196 homes through the planned period.</p> <p>CPBC transport assessment provided high level modelling of the impact of growth on key highway junctions. Further transport assessments will be carried out as housing allocations come forward during the local plan period.</p> <p>BBC and the other South Essex Local Authorities are currently preparing their local plans and developing their housing strategies to accommodate the expected significant growth across South Essex. As these local plans come forward, their transport assessments will add to the evidence and provide greater granular detail of the impact of this cumulative growth on the transport network.</p> <p>CPBC recognises that congestion on A127 is an issue for growth in the region and will positively engage with BBC and other Essex authorities to ensure that impact of its growth and the growth from other authorities on transport network is carefully considered including A127 and A129.</p> <p>CPBC recognises the need to carefully consider the impact of growth on sustainable transport networks and will positively engage with South Essex Authorities to Avoid, Minimise or Mitigate any impacts.</p>
Chelmsford City Council (CCC)	<p>CCC recognises there may be some challenges and constraints on developable land in CPBC's administrative area</p> <p>CCC welcomes the full provision of the required Gypsy and Traveller Sites within the administrative boundary of CPBC.</p>	<p>Points noted.</p> <p>Support for policies SD4 and SD5 noted and suggestion for exploring cross-boundary opportunities for climate adaptation infrastructure</p>

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	<p>CCC commends the Plan's place-led approach and its clear commitment to environmental stewardship, climate resilience, and nature recovery.</p> <p>Support Policies SD4 and SD5 which addresses net-zero ambitions. CCC also suggests strengthening delivery mechanisms for retrofit and energy efficiency in existing housing stock. CCC suggests exploring cross-boundary opportunities for climate adaptation infrastructure, especially in relation to water management and heat resilience.</p>	
Environment Agency	<ul style="list-style-type: none"> Policy C8 – Residential Park Home Sites, Canvey Island: The EA raised concerns over the increased residential development on these sites, which are in Flood Risk Zone 3, in that Policy 4.c (sic) can be interpreted as though any redevelopment would be acceptable on this site (either Park Homes or conventional dwelling houses), which does not reflect the justification paragraph 8.69 which refers to the limited lifespan of Park Homes compared to traditional homes. Policy D6 - Residential Annexes: EA requested within their response to the Regulation 19 consultation that additional wording should be added with regards extensions to single storey dwellings in high-risk flood areas, as residents in these types of dwellings are highly vulnerable to flood risk. 	<p>Policy C8: The Council is keen to encourage that any dwellings on these sites are flood-resilient and has proposed the following changes to the policy to 4.a. and 4.b.</p> <p>7.1 4. Any redevelopment of these sites will be acceptable where:</p> <p>7.2 4.a. The risk to occupants and property from flood risk and other hazards are minimised. With residential development having regard for flood resilient design. Guidance on designing flood resilient homes can be found in Improving the Flood Performance of New Buildings and in Building a flood resilient future.</p> <p>7.3 4.b. The overall quantum of residential development is retained, or increased;</p> <p>Policy D6: Additional wording at D6 Residential Annexes</p> <p>7.4 <i>d. The design of annex or extensions should include flood resistance and resilience measures to allow the development to be quickly brought back to use without</i></p>

Consultee	Specific Issues Raised	Council Response/Action
		<i>significant refurbishment. For single storey dwelling, a place of safety/refuge above the assessed level of flooding from any source should be considered</i>
Essex County Council	<p><u>Broadly support several policies (subject to additional references being added), including:</u></p> <ul style="list-style-type: none"> • Policy SP2 Masterplans • ENV 1,2,3,4,5 The Green Infrastructure Objectives and policies to deliver the ELNRS including the greening of town centres • The requirement of masterplans for development schemes to be approved prior to submission of a planning application • SP4 Developer Contributions Policies • T3 Policies for the design and provision of walking and cycling routes • Policy C5 Improved Access to and around Canvey Island and identification of Canvey's Community assets of the Paddocks and Thorney Bay Pavillion • HAD2 Proposals to recreational improvements at Hadleigh Country Park • HOU4 Specialist Housing Requirements • HOU6 Approach to Gypsy and Traveller Accommodation • TC5 Policies on Hot Food Takeaways • D1,2,3,4, Design policies • ENV2 Coastal and Riverside Strategy • Reference to Employment and Skills Plans within the Plan • Reference to EPOA Parking Guidance within the Plan 	<p>Statement of Common Ground drafted (for which detailed reference should be made given the detailed extent of ECC comments)</p> <p>Support noted</p>

Consultee	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> • INFRA3 Improving health and Wellbeing • INFRA6 Communications and Infrastructure • Provision of Transport Assessments and Travel Plans for Development impacting Highways • Policy SD1 Tidal Flood Risk management • SD4 Net Zero Carbon Development • SD5 Embodied Carbon <p>Multiple comments and requests for amendments as detailed opposite</p>	<p>References have been added to Strategic, Site Allocation and Development Management Policies to:</p> <ul style="list-style-type: none"> • References to the SSHANA (2025) in the Vision and Objectives and SP3 Meeting Development Needs, D1 Design Objectives, INFRA1 Community Facilities, T3 Active Travel, Monitoring Objective 16 and 18, Equality Impact Assessment • References to Urban greening in SP1 Supporting and Enhancements of Green spaces and SP2 Making Effective Use of Urban Land and Creating Sustainable Places, B1 South Benfleet Town Centre, HAD1 Hadleigh Town Centre, THUN1 Thundersley Centre • Reference to Naturetownsandcities.org for C1 Canvey Island Town Centre • Reference to Armstrong Road Waste Consultation Area B6 Church Road Benfleet • Reference to EPOA Parking Guidance HAD1, T7 Parking Provision • Need for further cumulative assessment on early years provision, Transport Assessment and IDP with the addition of Canvey West site and changes to some Benfleet sites, and additional new evidence published post May 2025 • Reference to Essex and Thurrock Skills and Improvement Plan E3 Development of Local Needs • Reference to School Design Guidance T6 Safe Access • Reference National Child Measurement Programme and Castle Point and Rochford Health and Wellbeing Strategy, Essex Healthy

Consultee	Specific Issues Raised	Council Response/Action
		<p>Weight Strategy TC5</p> <ul style="list-style-type: none"> • Reference to ECC Development Management Policies Highways Planning Advice <p>T8 Access for Servicing</p> <ul style="list-style-type: none"> • Reference EPOA Planning Policy Statement-Operational Energy and Carbon (Net Zero) (October 2025), SD4 Net Zero Carbon Development (In Operation), SD5 Net Zero Carbon Development (Embodied Carbon).Monitoring Objective 6 • Shared Standards in Water Efficiency for Local Plans (June 2025) • SD9 Water supply and Waste Water • Updates to the Level 1 & 2 SFRA to incorporate 45% EA Peak Rainfall Intensity, reference to Sustainable Drainage Systems Design Guide for Essex (2020)
	<p><u>Policy SP1</u></p> <p>Objects to the weight given to the Essex Local Nature Recovery Strategy (LNRS) areas, and considers that the word “safeguarding” implies that Strategic Combined Opportunity Areas have the same weighting as statutory designations. ECC request replacing the word “safeguard” with “enable and support”.</p> <p>The ELNRS is one tool of a number which contribute to the biodiversity duty</p> <ul style="list-style-type: none"> • Supports the view that Green Belt has wider benefits from preventing urban sprawl, it also supports nature conservation and delivery of green and blue infrastructure. 	<p>A wording change has been agreed in the Statement of Common Ground to alter from “safeguard” to “protect and enhance”.</p> <p>The Council has a legal duty to have regard to the relevant Local Nature Recovery strategy for their area within their local plans.</p> <p>Paragraph 192 (a) of the NPPF states that plans should identify, map and safeguard areas identified by national and local partnerships for habitat management, enhancement, restoration or creation... it then goes on to say that (Local Planning Authorities) “should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance.” This position is further supported by Section 40 & 41 of the NERC Act 2006.</p> <p>Essex LNRS map identifies that large areas of Castle Point are areas of particular importance to Biodiversity (APIB), particularly around Canvey Island. Further inland there are various isolated APIBs which are Local Wildlife sites and Ancient Woodland. The strategic combined opportunity areas connect these APIBs to form nature corridors through habitat creation. The Essex Biodiversity Net Gain Evidence for Need Aug 2024 refers to the difficulties that</p>

Consultee	Specific Issues Raised	Council Response/Action
		isolated designated sites have in surviving with many being in poor condition.
	<p><u>Policy SP3 Meeting Development Needs</u></p> <p>Considers the Castle Point Plan does not meet the Standard Methodology Housing Need requirement outlined in NPPF, but notes that there are notable environmental constraints including Green Belt, International and National designations, flood risk and highway and junction capacity issues.</p> <p>Comments that Castle Point has had Ditch meetings and made requests to its neighbouring authorities to assist with its unmet housing needs and no opportunities have come forward outside its boundaries to meet its unmet need. Recommends Socages prepared.</p> <p>Notes that evidence has been put forward to support CPBC housing strategy but queries its robustness and transparency in light of the short fall of housing. Queries the non-inclusion of potential development sites proposed in the Green Belt assessment, the weight and justification of “severe” transport constraints and the weight applied to strategic combined opportunity areas for biodiversity in site allocation criteria.</p>	It is agreed that the Castle Point Plan does not meet the Standard Methodology Housing Need requirement. It is agreed that Castle Point faces notable physical constraints including size, density and transport issues and environmental constraints with a substantial proportion of land designated as Green Belt and a significant proportion falling within Flood Risk Zone 3

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	<p>Schools in the Green Belt ECC requires that certain School Sites are removed from Green Belt designation in order to expand if necessary and allocated as education land.</p>	<p>Not accepted. The new plan proposes a new housing strategy of urban intensification consequently the Green Belt becomes more significant as the Green Belt tightly bounds the existing urban areas and there is limited green space in Castle Point. As all these sites are within designated Green Belt, the Council considers that further development of these sites is not acceptable.</p>
	<p><u>Development affecting the Green Belt (Policy GB1)</u> ECC seek Criteria 1 is amended to provide clarity that inappropriate development in the Green Belt will not be supported except in very special circumstances for consistency with NPPF, paragraph 17.14. ECC require Criteria 1 is amended to read: <i>Within the Green Belt, as defined on the Policies Map, inappropriate development will not be supported except in very special circumstances.</i></p>	<p>Criteria 1 will be amended. Criteria 1 is amended to read: <i>Within the Green Belt, as defined on the Policies Map, inappropriate development will not be supported except in very special circumstances in line with the NPPF.</i></p>
	<p><u>Community Uses</u> Recommends that education is not defined as community use in INFRA. Educational establishments and libraries should be protected for their existing use and change of use only permitted if ECC identifies other educational providers as being surplus.</p>	<p>CPBC agrees that the provision of facilities and services on these sites need to be protected. Paragraph 19.7 is making reference to that a number of community buildings including schools and Health Centres are located in aging buildings and do not use land efficiently. The intention of this policy is to retain the services but through development provide better designed premises to support these services into the future and at the same time provide additional benefits to the community in a multi-purpose development. Additional text at 19.7 is added to emphasise that these services should be retained in the locality and that ECC must be consulted with regards any development proposals for remodelling educational, early years or library buildings. This will link into INFRA2.</p>

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	<u>IDP</u> ECC noted that evidence has been completed post the IDP May 2025 and needs to be incorporated into the IDP. Equally the IDP refers to three growth scenarios not the final housing strategy which is in the Reg 19 draft. ECC is of the view that that CPBC has not met its duty to cooperate.	CPBC has provided all the necessary data to ECC to undertake a further cumulative assessment for early years learning and a report has been provided to CPBC to feed into the IDP. In the Statement of Common Ground, ECC agrees that it has received all the necessary data for a revised cumulative assessment. CPBC have confirmed that they will provide ECC with the updated IDP prior to submission of the Plan. ECC and CPBC agree that the IDP is a living document and will be updated as new information is available.
	<u>Transport Assessment</u> Need for further cumulative assessment on Transport Assessment with the addition of Canvey West site and changes to some Benfleet sites, and additional new evidence published post May 2025.	ECC is satisfied that CPBC has met its Duty to Cooperate upon receipt of the revised Transport Assessment (and IDP) prior to submission of the Castle Point Plan.
	<u>SFRA</u> ECC request updates to mapping and climate change allowances and the Critical Drainage Area information and reference the SuDS Design guide.	Updates to the Level 1 & 2 SFRA to incorporate 45% EA Peak Rainfall Intensity, reference to Sustainable Drainage Systems Design Guide for Essex (2020)
	<u>Specialist Housing Requirements</u> Supports Policy HOU4 Specialist Housing Requirements but the policy needs to distinguish between market and affordable/social rent provision in criteria 2a for HOU4	The evidence SSHANA (2025) is unclear on how it should be used for planning purposes, and it is unclear on what the tenure split should be for this policy for Castle Point. ECC to provide further clarification on the requirement for this policy, should they require amendment to the policy wording.

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Essex & Suffolk Water	<ul style="list-style-type: none"> General commentary on constraints of the area and supply issues. ESW encourage developers to submit pre-application enquiries Policy SP3 Concern that Park Homes and Caravan Parks are not obliged to conform to the water efficiency requirements of Policy SD9. Policy SD9 Water Efficiency standards. E&SW draw attention to the recently published regional shared standards for water efficiency in local plans, Shared Standards in Water Efficiency for Local Plans. They state that evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible. Employment Need and Employment Land (Policies E1, C4 and B8): Note that E&SW do not have the same statutory obligation to provide water for non-domestic purposes and may be unable to immediately do so if the new water requirement is greater than the residual capacity in our network. We therefore have a particular interest in proposed strategic employment and economic development within your administrative area so that we can plan timely investment to increase capacity should it be needed. 	<p>Statement of Common Ground agreed and signed</p> <ul style="list-style-type: none"> Consensus agreement regarding water scarcity, Essex's status as a water stressed area, the need for new development to be water efficient, the future water resource balance forecasts and the need for new infrastructure as identified in the IDP Whilst Councils can encourage pre-application discussions, it is an optional, discretionary service and cannot be made a requirement. Park homes are generally exempt from UK Building Regulations (including Part G water efficiency standards) but new park homes intended for permanent residential use must comply with the British Standard BS 3632 which promotes water efficiency through requirements for specific types of plumbing systems and water-using appliances. The Council will encourage compliance with relevant water efficiency standards as far as possible. Modification to Policy SD9 with a 85 litre per person per day of mains supplied water/potable water per person per day (as previously already agreed with ECC in their SoCG) included in E&SW SoCG. Throughout the Castle Point Plan, the need to collaborate with a range of stakeholders to ensure delivery of development is highlighted. Paragraph 16.38 identifies that through the master plan process, infrastructure providers will be engaged, however it is agreed this could be clarified further through Policy D3, so proposed clarifying additional reference to 'infrastructure providers' as a group who developers must engage with in Master Plan preparation.

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Historic England	<ul style="list-style-type: none"> Historic England (HE) request additional highlighting of the heritage status of Hadleigh Castle HE support Policy Had1 Policy Had2: Request incorporation into policy (from supporting text) recognition of Hadleigh Country Park's visual prominence and its role in forming the setting of Hadleigh Castle. Policy D9: HE request more assertive wording and hyperlinks Appendix H: HE request acknowledgement caveat to clarify that the lists of heritage assets are subject to change over time. This will ensure that the Plan remains flexible and up to date as further information becomes available. 	<p>Statement of Common Ground agreed and signed</p> <ul style="list-style-type: none"> Additional emphasis added to paragraph 10.2 confirming Hadleigh Castle is a Scheduled Monument and Grade 1 listed. Clarifications to Policy Had2 wording and format Policy D9 – minor modifications proposed and additional hyperlinks in line with HE's requests. Appendix H caveat added noting the list may change over time.
National Highways	<p>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 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.</p> <p>Policy C5: National Highways request to be engaged and included in any future consideration of a new access to Canvey Island</p>	<p>Although Government Departments are mentioned in C5(2) it is agreed that National Highways warrants specific mention in Policy C5 and a clarifying mod is proposed.</p>
Natural England	<ul style="list-style-type: none"> NE support multiple policies including SP4, C1, C3, DH1, Thun4, C6, Thun4, DH1, ENV2, ENV6 and INFRA4. 	<p>Statement of Common Ground drafted and awaiting response from NE. Including:</p> <ul style="list-style-type: none"> Proposed clarification to Vision 'Natural assets are protected and nature recovery is prioritised.'

Consultee	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> • NE request the Vision references the protection of existing nature conservation sites and adherence to nature recovery priorities. • Policy SP1: NE 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. The management of any new and enhanced green infrastructure should ensure it provides long-term benefits for Castle Point. NE recommends it should be managed, maintained and monitored for a minimum of 30 years. • Policy SP2: NE note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy. • Policy SP3: NE request more clarity in the reference to Habitats Regulation assessment process. • Policy C4 needs careful consideration to ensure that there are no harmful impacts on the notified features of Canvey Wick SSSI. • Policy D3 Masterplans should include the need for multifunctional green infrastructure outlining how it has been integrated into a scheme to create high-quality, sustainable places. • Policy ENV1: Reference to National Character Areas and Local Landscape Character Assessment areas recommended. • Policy ENV3: NE request additional confirmation of scale of SANG required, and clarification that SANG may be subject to future updates. 	<ul style="list-style-type: none"> • Clarifications proposed to Policy SP1 reflecting NE's comments. • Clarifications proposed to Policy SP2 reflecting NE's comments. • Multiple minor clarifications added confirming that HRA will need to demonstrate no adverse effects on site integrity before development can be granted permission. • Policy C4: Minor addition to supporting text proposed ensuring that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development. • Policy D3: Additional paragraph proposed to supporting text of Policy D3 clarifying the key role of green infrastructure in line with the wider plan vision. • Policy EN1 Clarifying references to Landscape Character Areas proposed to be added to Policy ENV1 and its supporting text. • Policy ENV3: Clarifying statements regarding appropriate scale of SANG proposed to be added. • Minor clarifications to supporting text of ENV3 proposed. • Policy SD1: Clarifying additions proposed to supporting text regarding compensatory habitat and long-term monitoring. • Modification to Policy SD9 with a 85 litre per person per day of mains supplied water/potable water per person per day (as previously already agreed with ECC in their SoCG) included in NE SoCG. • Policy SD9; CPBC respond that the Council remains committed to RAMs through the HRA process in recognition of the recreational pressure concerns on coastal Habitats Sites. CPBC is one of 12 lpas which uses the Essex RAMs SPD. This requires all new development to pay a tariff which is aimed at mitigating the effects of visitor pressure on coastal habitats sites.

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	<ul style="list-style-type: none"> NE support the 20% BNG target noting that this aligns with the wider Essex ambitions for 20% Biodiversity Net Gain to support nature recovery and delivery of the LNRS. Policy SD1: NE request input regarding compensatory habitats and clarity regarding long-term monitoring. Policy SD9. NE welcomes water efficiency standards stating that useful reference can be made to the recently published Shared Standards for Water Efficiency. Policy INFRA 4: NE state that 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. NE also commented on both the HRA and the SA/SEA (Please see respective sections in this Consultation Statement for more details) 	<p>The Plan's Open Space standards were informed and justified by supporting evidence in the form of the Open Space Assessment by Ethos Environment Planning in 2023. Therefore, the Plan's Open Space standards are evidence based and it would be considered appropriate to alter the basic standards at this stage of the Plan process.</p> <p>Note: The 2023 Open Space Assessment did engage with Natural England as a key stakeholder and did also consider national guidance and recommendations, including Natural England's Green Infrastructure and ANGST Standards, Natural England's MENE survey.</p>
NHS Integrated Care Board (ICB)	<ul style="list-style-type: none"> NHS ICB request amendments to the Vision requesting reference to health be strengthened by saying that health inequalities will be reduced reflecting the ICS' common endeavour. The ICB supports the inclusion of policies Infra3, Infra5 and associated supporting text; and requests that their effectiveness in improving health in existing areas and reducing health inequalities that exist in the district is monitored and opportunities are taken to amend policies to improve performance in these areas as appropriate. 	<p>Statement of Common Ground drafted and awaiting response from NHS ICB. Including:</p> <ul style="list-style-type: none"> NHS ICB and CPBC have agreed support and understanding in relation to several policies and principles, as follows: <ul style="list-style-type: none"> Overarching NHS ICB comment Duty to Cooperate Legal Compliance ICBs common endeavour is reflected in the Plan Objective 19. The opening sentence of the Vision recognises the fundamental importance of health, stating <i>'All residents have the opportunity to fulfil their potential and live happy, healthy, productive lives.'</i> Support noted. Health factors and presence of health-care services is monitored as part of the Plan Monitoring

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		<p>Framework. Similarly, open space, recreation and highway safety all form part of the background evidence supporting the plan-making process.</p> <p>This evidence has been used to inform policies and to improve performance in these areas as appropriate.</p>
NHS Property	<ul style="list-style-type: none"> Request Policies SP4/Infra3 should cross-refer Policy INFRA1: NHSP request the Council to provide clarity in supporting paragraphs in reference to the disposal process of healthcare facilities. Where healthcare facilities are demonstrated as being surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, we request that it is clarified and ensured that this will sufficiently satisfy the requirements under Point 4 (a) of the policy. 	<p>Statement of Common Ground agreed and signed</p> <p>NHS Property Services and CPBC have agreed support and understanding in relation to several policies and principles, as follows:</p> <ul style="list-style-type: none"> General principle: The importance of health infrastructure to support housing growth. Policy Infra3: Improving Health and Wellbeing Policy SD4: Net Zero Carbon Development (In Operation) Site Allocations Had 3: Hadleigh Clinic Site Allocation Thun 3A: Thundersley Clinic Evidence Base: Castle Point Plan Viability Study <p>Policies SP4/Infra3: Policy SP4, is a high level strategic policy, and the importance of working in partnership with the NHS regarding specific health related infrastructure is covered elsewhere in Policy Infra3. It is stated in the NPPF that Plans should avoid unnecessary duplication and implicit that policies apply.</p> <p>Policy INFRA1 – New paragraph clarifying need for written evidence and that the applicants should contact the Local Planning Authority at the earliest stage to discuss the details.</p>

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Port of London Authority	<p>Support policies SP1(4), C2, C5, C6, C9, SD1</p> <p>Policy C3: Clarifications sought</p> <p>Policy D4 Consider that there must be appropriate wording included on the vital need for future waterside developments to provide appropriate riparian life saving equipment</p> <p>Policy ENV2 Request PLA inclusion</p> <p>Request reference to both Sustainable Transport and Safe Access</p>	<p>Policy C3: Minor clarifications proposed to be applied to supporting paragraphs 8.27, 8.30 and 8.32.</p> <p>Policy D4 New supporting para</p> <p><i>16.49 Waterside developments should provide appropriate riparian life saving and safety equipment) as recommended by the PLA's 'A Safer Riverside Guidance' and the 'Drowning Prevention Strategy' (2019) produced by the Tidal Thames Water Safety Forum.</i></p> <p>Policy ENV2: Reference to PLA added</p> <p>Policy T1 Addition proposed ' 9. Supporting the use of the Tidal Thames for both passengers and freight'</p> <p>Policy T6 Supporting paragraph proposed on 'Supporting the use of the Tidal Thames for both passengers and freight'</p>
Rochford District Council	<p>Housing numbers, Policy SP3 and Green Belt: Considers that the local plan is not compliant or sound as the housing strategy does not meet all of the housing need calculated by the standard methodology but recognises that CP has significant environmental and physical constraints to meeting its housing need. RDC raised concerns about CP housing strategy approach in previous responses.</p> <p>RDC considers there is a lack of technical justification and robust evidence to support the shortfall in housing delivery particularly with regards the assessment of reasonable alternatives of sites located within the Green Belt. Suggests technical evidence could include further transport assessment on the cumulative impact of growth across South Essex..</p> <p>Policy Thun 2: Raises issue of impact on infrastructure and loss of school and recreational facilities for policy THUN 2 and recommends this site is carefully master planned and for RDC to be involved in these discussions.</p> <p>Support CPBC policies on G&T (Hou6), Economy (E1, E2) Town Centres and Retail Areas (TC1), Hot Food</p>	<p>See Statement of Common Ground</p> <p>Housing numbers and green belt sites as per Basildon response.</p> <p>Thun 2: Noted and CP will collaborate with RDC on the masterplan for Thun2</p> <p>Supports noted</p>

Consultee	Specific Issues Raised	Council Response/Action
	Takeaways (TC5), ENV1 (Landscape), SP4 (Development Contributions), Transport Policies (T1, T2, T3, T4)	
Southend City Council	<ul style="list-style-type: none"> Objection to 'soundness' of the Plan due to the failure to meet identified housing need, and importantly lack of robust evidence for this shortfall and justification for the dismissal of alternative spatial strategy options and previously considered Green Belt development sites that might have enabled the Borough to meet its housing need in full or 'closed the gap' The not insignificant constraints in relation to flood risk and international and national biodiversity designations are also recognised. There is also a significant proportion of land designated as metropolitan green belt within the Borough. Support omission of GB8 Land South of Hadleigh. Policies for biodiversity and landscape are supported Support highlighting the important inter-connections between Southend-on-Sea and Castle Point in terms of transport (particularly the London Fenchurch Street to Shoeburyness railway line), employment, education and skills, and environmental assets. . 	<p>See Statement of Common Ground</p> <p>Housing numbers and green belt sites as per Basildon response.</p> <p>Minor mods to monitoring framework objectives proposed, as well as key diagram is to be updated to include Leigh Port as "Port Facilities".</p>

Consultee	Specific Issues Raised	Council Response/Action
Sport England	<ul style="list-style-type: none"> • Sport England (SE) support the following policies and principles <ul style="list-style-type: none"> ○ Vision ○ Objectives ○ Policy SP1 ○ Policy SP3 ○ Policy SP4 ○ Policy B9 ○ Policy Had4 ○ Policy Thun2 ○ Policy Infra4 ○ Policy Infra5 ○ Policy T1 ○ Policy T3 • PolicyD1: Objection to Plan in current form that could be addressed • Policy Infra3: Objection is made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness. 	<p>Support noted</p> <p>Policy D1 – Clarification additions proposed to be added to meet SE's concerns. Policy D1 to 'Maximise opportunities for encouraging physical activity'. Reference in supporting text added to SE's 10 principles.</p> <p>Policy Infra3: - Clarification additions proposed to be added to meet SE's concerns. Policy INFRA3 to 'Expecting all development proposals to be planned and designed to encourage more active and healthier lifestyles'. Reference in supporting text added to development design to promote active and healthier lifestyles and to have regard to the Sport England Active Design Guidance.</p>
Thurrock Council	<ul style="list-style-type: none"> • Meeting Housing Need and Policy SP3: Objections • Policy C5 Access to Canvey Island: It remains a local aspiration to deliver a third road to Canvey Island, although currently there is no deliverable scheme that can be identified. TC notes that CPBC intends to prepare a feasibility study (Policy C5) to explore options and welcomes further discussion to provide for better access to and from Canvey Island 	<p>See Statement of Common Ground</p> <p>Housing numbers and green belt sites as per Basildon response.</p> <p>Comments on Policy C5 Access to Canvey Island noted</p> <p>Supports noted</p>

Consultee	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> • Support Policies on Sustainable Development SD4 and SD5 • Supports Policy on Local Wildlife and Geological Sites ENV4 	

9. Non-Statutory Consultees and Interest Groups

9.1 This group includes:

- Community Groups: Advocating for specific interests, such as environmental protection, sports, and cultural activities.
- Local Businesses: Providing insights on economic growth and employment needs.

9.1 Regulation 18 Consultation: Main Issues from 'Non-Statutory Consultees and Interest Groups' and Council Response

These are a selection of significant issues from 'Non-Statutory Consultees and Interest Groups' from the Regulation 18 stage consultation which took place between 22 July and 16 September 2024.

Consultee	Specific Issues Raised	Council Response/Action
Essex Police	<p>The police service has outlined several costs of developer funded police facilities required to mitigate and manage planned housing and population growth which will impact the Castle Point Policing Area.</p> <p>They believe the evidence provides justification for a schedule of Police Facilities for inclusion within the IDP. They support planning policies promoting public safety, including through the layout and design of developments.</p> <p>Essex Police also recommend all new major developments of 250 dwellings or higher engage in consultation with the Police in order to determine an appropriate level of developer contributions in the Section 106 agreement</p>	<p>The police service's statement highlights the need to address public safety and infrastructure requirements in response to planned housing and population growth in the Castle Point Policing Area.</p> <p>The need for community facilities which includes emergency services and police facilities has been considered in the Plan and any infrastructure projects identified will be included in the Infrastructure Delivery Plan.</p> <p>Policies on design are included in the draft Plan and will require considerations of public safety, including through the layout and design of developments.</p> <p>Policy D1 – Design Objectives - All new development should be designed to a high standard, having regard to the most up to date design guidance or design code for the site or its location. This includes ensuring opportunities to design out crime. Also requires opportunities for accessible and inclusive design takes into account the needs of different cultures and genders.</p> <p>Essex police is a consultee on major residential proposals applications. They are also on the consultees database for the Plan and will be notified of consultation being undertaken at the different stage in the process.</p>

Consultee	Specific Issues Raised	Council Response/Action
Home Builders Federation (HBF)	<p>The HBF considers the Council's housing needs assessment to be unsound. They believe that the discrepancy in net migration data from 2014 does not amount to exceptional circumstances and cite the Inspector examining the North Norfolk Local Plan who delivered a similar verdict.</p> <p>The HBF supports a higher level of house building as proposed in the NPPF consultation from July 2024. The HBF support a new access to Canvey.</p> <p>They also warn caution regarding how many homes could be delivered in North West of Thundersley over a plan period.</p> <p>The HBF support the future homes standard as set out in building regulations and a standard beyond current or future standards must be consistent with national policy assesses its consequences.</p> <p>The HBF do not object to the lower standard of 110 l/p/d being adopted for</p>	<p>Support for Higher Levels of House Building (NPPF Consultation, July 2024)</p> <p>The Council acknowledges the HBF's support for a higher level of house building as proposed in the NPPF consultation. However, Castle Point Council remains committed to preparing a Plan that addresses housing need in line with the Standard Methodology. However, achieving this in full within our administrative boundary remains challenging due to the constraints. We will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. We will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Support for New Access to Canvey The Council welcomes the HBF's support for new access to Canvey. Improved access is a key element of the Castle Point Plan, designed to support growth and enhance connectivity. This aligns with the Council's objectives to ensure that infrastructure improvements accompany housing delivery.</p> <p>Homes in North West Thundersley (NWT) The Council acknowledges the HBF's caution regarding the potential delivery of homes in the North West Thundersley area.</p> <p>North West Thundersley (GB16) is not proposed for allocation in the Plan. There are extensive issues and interdependencies, requiring further evidence in relation to NWT which go beyond the current plan period.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>water efficiency but believe any higher levels of efficiency are not supported by national policy.</p> <p>The HBF do not consider it to be justified to aim for higher than 10% BNG.</p> <p>Finally, they consider ensuring utilities capacity to be key and the Council must take this into account when plan making.</p>	<p>The Council remains committed to ensuring that proposed housing allocations are realistic and that infrastructure, environmental, and delivery challenges are fully addressed. The Council will continue to engage with developers and stakeholders to ensure delivery remains viable over the plan period.</p> <p>Future Homes Standard and Building Regulations: The Council supports the future homes standard as outlined in national policy and agrees that any local standards must be consistent with national policy. The Council has carefully assessed the implications of the standards proposed in the Plan to ensure that they are realistic, justified, and deliverable without imposing undue burdens on developers.</p> <p>Water Efficiency and Drainage This issue has been considered in the Plan. Policy SD9 – Water Supply and Waste Water.</p> <p>All new residential developments should achieve a water efficiency standard of no more than 90 litres per person per day. Where it can be demonstrated that this is not feasible part G2 and regulation 36(2)(b) of the Buildings Regulations will apply.</p> <p>The recent Future Homes Hub Water Efficiency Report (April 2024) sets recommended water efficiency targets for 2025 and 2035 for seriously water stressed areas including Essex from 90-80.</p> <p>Further application of these enhanced standards to the levels proposed for 2035 will be considered as part of a review of this plan, considering the potential viability implications.</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>Biodiversity Net Gain (BNG)</p> <p>The Council recognizes the HBF's position that aiming for higher than a 10% BNG is not justified. The Plan adheres to the national policy requirement of 10% BNG. Where opportunities arise for higher gains in partnership with developers, these will be pursued, wherever feasible and subject to viability.</p> <p>A policy has been developed in the Plan dealing with BNG: Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain. The requirement is for 10% BNG on all applicable brownfield sites; and 20% on all applicable greenfield sites.</p> <p>The Environment Act 2021 mandates that most developments should deliver at least 10% BNG, but local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% BNG on sites to improve contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex.</p> <p>The Council appreciates the HBF's feedback and remains committed to working collaboratively with stakeholders to deliver a sound, sustainable, and deliverable Plan.</p>
Leigh Conservation and Heritage (LACH)	<p>The LCAH has issues with the Green Belt site GB8.</p> <p>This is due to the impacts on the historical monument of Hadleigh Castle as well its proximity to the ancient town of Leigh-On-Sea.</p> <p>Furthermore, the Green Belt creates an important separation between</p>	<p>The council acknowledges the concerns raised by the LCAH. The council is committed to ensuring that planning decisions respect and preserve the unique character of the area while meeting housing and development needs.</p> <p>The site GB8 Land south of Hadleigh is not proposed for allocation Plan.</p> <p>Policy D9 - Conserving and Enhancing the Historic Environment:</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>Leigh and Hadleigh and LCAH are worried about the clear visual separation between the two towns diminishing</p>	<p>Under the Policy development proposals affecting a heritage asset (either designated or non-designated) will be required to conserve, and where appropriate enhance, the heritage assets and their setting, in accordance with the requirements set out in the NPPF.</p> <p>The Policy will apply to Hadleigh Castle a Scheduled Ancient Monument.</p> <p>The council will continue to engage with local stakeholders, including LCAH, to understand concerns and incorporate community input into the decision-making process.</p> <p>Further public consultation opportunities will be provided as part of the Plan process to ensure transparency and collaboration.</p>
RSPB	<p>Opportunity to involve nature as part of the flood protection system of Canvey.</p> <p>The RSPB has issues with a potential new road off Canvey due to environmental concerns.</p> <p>The RSPB agrees with the Council that recreational access to the South & West Canvey Wildlife Corridor should be within appropriate levels and they are pleased to see that the Council is working with landowners to continue to enhance wildlife provision in this area is considered important.</p>	<p>The Council appreciates the RSPB's constructive feedback and ongoing commitment to environmental conservation within the borough.</p> <p>Nature-based flood protection: We recognise the potential to integrate nature-based solutions as part of flood protection systems and will explore opportunities where feasible. This is consistent with policy SD3.</p> <p>New road on Canvey: The Council acknowledges the environmental concerns raised and will ensure thorough assessments are conducted to mitigate impacts. The need for this is acknowledged in policy C5 part 4.</p> <p>South & West Canvey Wildlife Corridor: The Council is pleased with the RSPB's support for maintaining appropriate recreational access levels and will continue collaboration with landowners to enhance wildlife provision.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>RSPB supports the protection of SSSI and SPA's within the borough.</p> <p>The RSPB believes the brownfield land identified in option 1 to generally offer the most value and least environmental impact. However, each brownfield site should be assessed on a case-by-case basis as some are very biodiverse or have the potential to be so.</p> <p>They are concerned with Option 2. Potential site GB1 is very close to Canvey Wick SSSI and would strongly recommend a policy of a minimum 400m buffer to residential development around the SSSI.</p> <p>Furthermore, GB2 and GB3, along with GB7, which appears to be within c200m of Benfleet and Southend Marshes SSSI, and GB8 all may have possible cumulative and individual impacts on the SSSI and SPA nearby. This would mainly be through further recreational disturbance impacts.</p> <p>Currently the Green Belt in those locations is helping to buffer the</p>	<p>SSSI and SPA protection: We share the RSPB's commitment to protecting SSSI and SPA sites and will prioritise these areas in our policies. This is outlined in policy ENV3.</p> <p>Brownfield development: The Council agrees with assessing brownfield sites on a case-by-case basis to balance development needs with environmental considerations. ENV3 provides the framework for this.</p> <p>Green belt land: The Council acknowledges the Green Belt's role in acting as a buffer. The draft plan does not propose GB1, GB2 or GB3 as allocations, or any land for development in the Green Belt.</p> <p>Habitat prioritisation: Policies will aim to ensure that tree planting and woodland creation do not harm critical habitats such as flower-rich grassland or lowland dry acid grassland.</p> <p>Under Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain in the Plan proposals which impact on protected species, priority species or priority habitats are identified and the biodiversity hierarchy in the NPPF is strongly applied. Where full avoidance, mitigation and compensation cannot be achieved, applications affecting such sites will be refused.</p> <p>Swift bricks in new developments: Policy ENV5 – Design Features that Encourage Biodiversity. Requires all new development should incorporate features which support priority or threatened species such as swifts, bats and hedgehogs and ensure opportunities to integrate nest sites for protected species into the urban fabric are utilised.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>designated areas, nature reserves and functionally linked land.</p> <p>They also suggest the use of Swift bricks in all new developments both residential and commercial.</p> <p>Any new or increased use of Green Belt should ensure recreational disturbance impacts on wildlife sites are addressed, which might require use of buffer zones and SANGS.</p> <p>They suggest that policy ensures that the planting of trees and/or creation of woodland is not at the detriment of other important habitats such as flower-rich grassland, or low nutrient open ground habitats such as lowland dry acid grassland.</p> <p>Finally, the RSPB would like to see the Council working with NGOs, farmers, and other land managers to increase the quality of the surrounding landscape and ensuring that agri-environmental schemes deliver the best results for nature.</p>	<p>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 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).</p> <p>Recreational disturbance impacts Under Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain in the draft plan the Council will seek to secure nature recovery and biodiversity net gain.</p> <p>Collaboration on landscape quality: The Council is committed to working with NGOs, farmers, and land managers to improve the surrounding landscape, leveraging agri-environmental schemes to deliver tangible benefits for nature. This is outlined in the Council's Corporate Plan.</p> <p>The Council values the RSPB's partnership in ensuring sustainable development and conservation across the borough.</p>

Consultee	Specific Issues Raised	Council Response/Action
The Woodland Trust	<ul style="list-style-type: none"> The Woodland Trust supports the protection of valued habitats which must be at the heart of the LP. In particular, irreplaceable habitats, including AVTs, must be protected from loss and damage. They believe the Plan should give weight to the relevant Local Nature Recovery Scheme as it is refined. They support adhering to appropriate buffering standards for ancient woodlands and AVTs. The Woodland Trust supports exceeding the minimum BNG standard and encourage the Council to aim for at least 20%. 	<p>Comments are welcomed and have been taken consideration as a key objective of the Plan.</p> <p>A policy has been developed in the Plan dealing with BNG: Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain. The requirement is for 10% BNG on all applicable brownfield sites; and 20% on all applicable greenfield sites.</p> <p>The Environment Act 2021 mandates that most developments should deliver at least 10% BNG, but Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% BNG on sites to improve contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex.</p> <p>In determining applications for planning consent the Council will seek to secure nature recovery and biodiversity net gain by:</p> <p>Applying the principles related to the biodiversity hierarchy, Sites of Scientific interests (SSSIs) and irreplaceable habitats set out in national planning policy. In Castle Point, ancient woodlands are considered to constitute irreplaceable habitats.</p>
Essex Bridleways Association (EBA)	<p>EBA emphasises the importance of commenting early in the consultation process to ensure their concerns are considered from the outset.</p> <p>While EBA understands the need for future residential and commercial</p>	<p>Thank you for your comments. The Council acknowledges the concerns raised by the EBA regarding the safety and welfare of vulnerable road users and the protection of public rights of way (PRoW).</p> <p>The importance of early engagement in the consultation process is recognised, and all feedback will be considered during the plan making process. The Council remains committed to ensuring development</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>development to meet building targets, they stress that this should not compromise the safety and welfare of public road and rights of way users, particularly equestrians.</p> <p>EBA highlights the increasing safety risks for vulnerable road users, including equestrians, due to the rising volume of vehicles from new developments and construction traffic. They note a worrying trend of accidents involving horses and riders caused by speeding motorists.</p> <p>EBA calls for the Local Plan review to include definitive policies to protect vulnerable road users and the existing public rights of way (PRoW) network.</p> <p>They advocate for the creation of new safe off-road routes as a prerequisite for new planning applications.</p> <p>EBA expresses disappointment that their previously raised issues have not been addressed in the current Issues and Options statement. They recount past meetings with local authorities where promises were made but not</p>	<p>proposals incorporate measures to safeguard PRoWs and provide safe routes for all users, including equestrians, where feasible.</p> <p>Policy T6 - Safe Access:</p> <p>To ensure that development proposals offer safe access either directly or via appropriate mitigation, the following requirement must be met:</p> <ul style="list-style-type: none"> Safe access to the highway network for all users, having regard to the highway access policies of the local transport authority; and safe access to the site for cyclists and footway provision for pedestrians, including the approach to the site from the nearest public transport node. <p>Also Policy T3 - Active Travel Improvements supports additional active travel routes through open spaces will be subject to their design providing safe and inclusive access. This includes the creation of routes to provide recreational opportunities for walkers, cyclists and horse riders.</p> <p>We appreciate EBA's continued involvement and have taken the comments into account in the formulation of the proposed draft policies.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>followed through, and they urge the Council to use this consultation phase to demonstrate responsiveness to constituent concerns.</p>	
<p>Stantec on behalf of Coryton Asset Holdings Limited and Morzine Limited</p>	<p>Stantec represent the Thames Enterprise Park. They believe that Canvey is an important and growing source of local employment. They believe that cross boundary collaboration with Thurrock and other South Essex Councils will enable essential infrastructure such as highway improvements to be delivered.</p> <p>In addition to road improvements, expanding public transport services is essential. More reliable bus services between Canvey Island, Basildon, and Thurrock. Better integration of cycling infrastructure. By improving access, the Local Plan can support not only economic development but also environmental sustainability and social inclusion.</p> <p>Enhancing the capacity and functionality to create jobs and boosting the local economy. Economic</p>	<p>One of the primary focuses is on upgrading the road network, with particular attention to the strategic A130 route, which provides a key link between Canvey Island and the surrounding areas. Enhancing this connection would help alleviate congestion and facilitate better access to employment opportunities in Thurrock and beyond.</p> <p>The Council acknowledges Stantec's representation on behalf of Thames Enterprise Park and welcomes their recognition of Canvey Island as a key employment area within the borough.</p> <p>The Council supports cross-boundary collaboration with Thurrock and other South Essex authorities to secure investment in essential infrastructure, including highway improvements. Strategic transport interventions are crucial to improving connectivity, supporting economic growth, and enhancing the resilience of the local road network. The issues are recognized in the Plan and addressed a number of strategic policies:</p> <p>Policy C5 - Improved Access to and around Canvey Island. The Council will undertake a feasibility study to identify options for improving access to, from and within Canvey Island, including its wider strategic implications. This will be prepared in collaboration with key partners including ECC, adjoining districts and unitary councils, Transport East, Government departments such as the DfT, BEIS and MHCLG and relevant agencies as well as engagement with the local community.</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>growth must be balanced with environmental considerations. They support new homes in the borough to ensure the full economic potential of the sub region and to enable more employment opportunities for local people.</p>	<p>Policy T2 - Highway Improvements. The Council will support the local transport authority in securing improvements to the A13, A127 and A130, and associated junctions.</p> <p>The Council also recognises the importance of expanding public transport services and improving sustainable transport options. Enhanced bus services between Canvey Island, Basildon, and Thurrock, alongside better integration of cycling and walking infrastructure. This is addressed in Policy T3 - Active Travel Improvements, Policy T4 - Improvements to Public Transport Infrastructure and Services.</p> <p>The Council will seek to secure public transport infrastructure and service improvements within the Borough by delivering the transport improvements identified in the Infrastructure Delivery Plan. The Policy also supports proposals which extend public transport provision for Castle Point residents directly to employment locations in Basildon, Thurrock and Southend, and to the hospitals in Southend and Basildon. Under Policy T5 where necessary, the Council will secure planning conditions, highway works (s278) and/or financial contributions (s106) to deliver mitigation works necessary mitigate the impacts of development.</p> <p>In line with the Plans' strategic priorities, the Council supports economic development that balances growth with environmental considerations. The delivery of new employment opportunities must be accompanied by measures that mitigate environmental impacts and enhance the quality of life for residents.</p> <p>Regarding housing delivery, the Council acknowledges the need for a balanced approach that meets local housing demand while ensuring sustainable development. The Plan aims to facilitate the provision of new</p>

Consultee	Specific Issues Raised	Council Response/Action
		homes in appropriate locations to support economic growth and workforce availability while safeguarding environmental and infrastructure capacity.
Oikos	<p>Oikos welcomes the statement that the facility is of national importance but would like to reword the text to include that part of the significance of the site is due to its geographical location and connection to two key pipeline networks.</p> <p>Oikos does not consider the HSE maps to show "Risk" around both Oikos and Calor rather the maps show where certain levels of different controls over third party development are in place as a result of these facilities.</p> <p>They do not believe it is a sound position to indicate that any future development at the facilities should be required to demonstrate no increase in the level of risk.</p> <p>Oikos recognises managing flood risk within the borough, however they suggest that policies surrounding flood risk take into account the</p>	<p>The council acknowledges Oikos comments.</p> <p>In response the draft publication Plan proposes a Policy dealing with Canvey port facilities: Policy C3 - Canvey Port Facilities which is followed by a justification.</p> <p>The justification refers to geographical location and connection to two key pipeline networks.</p> <p>Consultation Zones</p> <p>Both installations have HSE consultation zones identified around them, in which it is expected that other development is controlled to limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new development is proposed.</p> <p>In terms of level of risk the Policy for Canvey Port Facilities (C3) also requires:</p> <p class="list-item-l1">b. Where the proposal includes a change of materials handled, and those materials are classified as hazardous, it can be demonstrated that the proposal is in the national interest;</p> <p class="list-item-l1">c. There must be no unacceptable change in the level of hazard or risk posed by the facility as a consequence of the proposals. The Health</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>circumstances and characteristics of the borough.</p> <p>Oikos does not support GB3 as a development option and suggests it is heavily constrained irrespective of its Green Belt status.</p>	<p>and Safety Executive must be consulted and their satisfaction sought in relation to this matter.</p> <p>Also relevant is Policy: Policy SD8 - Developments near Hazardous Uses:</p> <p>Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds</p> <p>Green Belt The Plan does not propose the allocation of site GB3 – Land south of Charleets for development.</p> <p>Flood Risk Flood risk is a key consideration of the Plan. Policies are included to deal with Tidal Flood Risk (SD1) Management and Non-Tidal Flood Risk (SD2) which are specific to the conditions existing in Castle Point. The extent of the Canvey, Hadleigh Marshes and South Benfleet Tidal Flood Risk Management Areas is defined on the Policies Map. Within these areas the Council will support the necessary improvements to the sea defences in the Borough as set out in the Thames Estuary 2100 Plan.</p> <p>New development proposals will be permitted only where they pass the Sequential Test and where appropriate the exception test, as set out in the NPPF. They are designed to be flood resistant and resilient.</p>

9.2 Regulation 19 Consultation: Main Issues from 'Non-Statutory Consultees and Interest Groups' and Council Response

These are a selection of the issues considered to be more significant from 'Non-statutory bodies and Interest groups' from the Regulation 19 stage consultations (Aug-Sept 2025 and Oct-Dec 2025). The full list of representations is published separately and should also be referred to.

Consultee	Specific Issues Raised	Council Response/Action
Local Businesses:	Objections from occupiers of both Charfleets Industrial Estate and Manor Trading Estate regarding the perceived allocation of these sites for mixed use comprising residential and industrial. Suggest that the policies have not fully considered the impact on the existing businesses, and that there has been little or no engagement with them.	<p>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</p> <p>Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not 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.'</p>
Canvey Town Council	Objections to Policies SP3, C3, ENV3, C1 and C10 <ul style="list-style-type: none"> • An additional 3300 homes on Canvey Island will overdevelop an existing heavily urbanised area, which is at maximum capacity. 	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.

Consultee	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> • Will impact the overall safety of the island and put additional pressure on an existing inadequate policing provision. • Canvey Island has two COMAH sites with no clear emergency plan, and an increase in development creating a larger population will further impede attempts to exit the island in an emergency with the existing inadequate road infrastructure in place. Threat of terrorism • Increase in vehicles, which the current insufficient road infrastructure cannot support. • Canvey Island is a flood zone 3a, Any use of remaining green belt land for development will add to the already high flood risk and could impact the overall safety of residents. <p>Policy ENV3:</p> <ul style="list-style-type: none"> • Concerns that proposed development sites may not have taken into consideration the protection of local wildlife. <p>Policy C1 and C10:</p>	<p>Protection of wildlife is a key consideration in the Plan as set out in the Environment chapter</p> <p>Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).</p> <p>Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE.</p> <p>Nonetheless some relevant minor mods are proposed to policies C1, SD3 and ENV3</p>

Consultee	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> • Development will limit and reduce much needed parking facilities for local shops and visitors. 	
Council for Preservation of Rural England (CPRE)	Supports the Plan	Noted
Essex Police	Supportive	Noted
Essex Wildlife Trust	Broadly supportive, but request some clarifications and additions to policies	Clarification modifications proposed to ENV2, ENV3 and ENV4 in response to EWT requests. But not to ENV4 since the EWT proposal goes further than the NPPF target species that are currently covered by the policy.
Home Builders Federation (HBF)	Insufficient Statement of Common Grounds Object to perceived under-delivery on housing numbers Object to emphasis on LNRS Object to policies preventing coalescence of settlements (e.g. Thun5) Objects to approach to Grey belt Objects to Zero-Carbon policies (SD4 and SD5) Objects to Policy SD9 water efficiency standards	SoCGs now updated 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. Within the NPPF Paragraph 11 section b (i) and (ii) give an acknowledgement of circumstances in which national policy does not expect

Consultee	Specific Issues Raised	Council Response/Action
		<p>Standard Method outcomes to be met in full. This includes situations where:</p> <ul style="list-style-type: none"> the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7 ; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. <p>Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding.</p> <p>Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that “Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations...” The NPPF footnotes set out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas). ”</p> <p>The Green Belt Assessment July 2025 reviewed all potential sites within Castle Point’s Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for development as outlined in the Housing Capacity Topic Paper August 2025.</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>The Council has a legal duty to have regard to the relevant Local Nature Recovery strategy for their area within their local plans. Paragraph 192 (a) of the NPPF states that plans should identify, map and safeguard areas identified by national and local partnerships for habitat management, enhancement, restoration or creation... it then goes on to say that (Local Planning Authorities) "should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance. " This position is further supported by Section 40 & 41 of the NERC Act 2006.</p> <p>Essex LNRS map identifies that large areas of Castle Point are areas of particular importance to Biodiversity (APIB), particularly around Canvey Island. Further inland there are various isolated APIBs which are Local Wildlife sites and Ancient Woodland. The strategic combined opportunity areas connect these APIBs to form nature corridors through habitat creation. The Essex Biodiversity Net Gain Evidence for Need Aug 2024 refers to the difficulties that isolated designated sites have in surviving with many being in poor condition.</p>
Oikos Storage	<u>Policy C3</u> Objects to intro paragraph wording caveat within the introductory sentence of the policy - 'will normally be permitted' (emphasis added), saying this introduces ambiguity into the decision-making process and	<u>Policy C3:</u> It is considered the policy is sufficiently supportive of Canvey Port Facilities. The word 'normally' acknowledges that there are standard planning considerations and criteria that need to be adhered to. The planning authority is obliged to consider the views of statutory consultees and other material considerations in the development management decision making process.

Consultee	Specific Issues Raised	Council Response/Action
	<p>removes the certainty that the policy should be aiming to achieve.</p> <p>Objects to Policy C3(b) requirement for the policy to be in the national interests, suggests this is contrary to the NPPF and The National Policy Statement for Ports (NPSfP)</p> <p>Objects to Policy C3(d) stating enhancements to access 'will' be sought. Taking a blanket approach to proposals in such a sensitive location is not considered to be justified or effective and contradicts paragraph 8.30 .</p> <p>Policy C3 (e) Objects to policy cross-reference as unnecessary</p> <p><u>Policy SD1</u> Object to Policy SD1(4) provision of 19m buffer since the criterion does not take into account that the buffer extends through the operational Oikos facility.</p> <p><u>Policy C6 (Green Lung)</u> should be deleted</p>	<p>C3(b). Paragraph 8.27 notes that 'The Calor Gas and Oikos terminals are nationally significant and have a role to play in ensuring the security of energy supplies in the UK'. Their national interest role is therefore implicit</p> <p>C3(d) Agreed that the coastal path may not be relevant or proximate to every application, Modification to Policy C3(d) proposed to align with supporting text,</p> <p>d. Public access to the coastal path adjacent to the site must be protected and opportunities to enhance access for pedestrians, cyclists and equestrians will be sought when appropriate;</p> <p>C3(e): Given the environmental sensitivities, specific cross-reference is considered appropriate in this case.</p> <p><u>Policy SD1</u> it is considered that Plan paragraphs 21.14 and 21.15 cover the need for early discussions with the Environment Agency at a very early stage in the event of formulating development proposals within the safeguarded sea defence area.</p> <p><u>Policy C6</u> has an important role to warrant retention.</p>

Consultee	Specific Issues Raised	Council Response/Action
RSPB	<p><u>Brownfield Land</u> <u>Policy SP3</u> To slightly amend wording in this Policy, such as 3a and Paragraph 6.34, to clarify "non-biodiverse" brownfield land is the focus for development. Also to amend wording accordingly throughout the Local Plan document.</p> <p><u>Policy SP2</u> Brownfield should be identified as potentially being high biodiversity (as per the Essex LNRS). Development on such land should feature brownfield features such as mixed aggregates and green roofs and walls. Such development design can also lead to improved well-being in places of residents and work. Policy SP2 should indicate that habitats and biodiversity will factor into development design.</p>	No likely to be possible to fully accommodate these request (Subject to further confirmation).
	Policy C4 West Canvey: Depending on where the 2000 new homes are located within this allocation, and the approach taken to the non-residential construction, there could be serious negative impacts on Canvey Wick	Mods to be considered to address the points.

Consultee	Specific Issues Raised	Council Response/Action
	<p>Site of Special Scientific Interest (SSSI), including to key populations of Essex Local Nature Recovery Scheme. Mod requested, including (not an exhaustive list)</p> <ul style="list-style-type: none"> Clarify that any new residential units (2000 homes) will be allocated to the eastern end of the broad location zone, well away from the SSSI and surrounding area, ideally outside a buffer zone of 400m; Clarify that a substantial protective buffer zone to Canvey Wick SSSI will be applied, within which there would be no new residential development, ideally of 400m or more to reduce impacts from recreation and pets; Clarify that any new development within the buffer zone and closer to the SSSI will be business or industrial units, and that these will not add pressures to the SSSI nor impede LNRS aims of connectivity; 	

Consultee	Specific Issues Raised	Council Response/Action
	<ul style="list-style-type: none"> Specify that any new residential units will not encourage direct access onto the SSSI area; 	
	<p>Policy C5: Access to Canvey</p> <p>Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder egos at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and biodiverse area, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.</p>	<p>Mods to be considered to address the points.</p>
	<p>Policies B8, B9, C3 and C6. Add suggested sentences about specific biodiversity improvements and references to the LNRS.</p>	<p>Mods to be considered to address the points.</p>

Consultee	Specific Issues Raised	Council Response/Action
	ENV1 There should be provision included to enable conservation organisations such as the RSPB to install any further predator exclusion fences on West Canvey Marshes.	Policy C4: Mods to be considered to address the concerns
	Policy SP4 Developers Contributions There should be mention of developer RAMS contributions.	Addition to supporting text to be added (TBC)
	Policy SD6 Pollution Control Section 21.56 addition - given the important invertebrate populations in Castle Point, further reference to the impact of artificial light on invertebrate populations would be welcome here.	Addition to supporting text to be added (TBC)
	Policy T2 Highway Improvements It should be clarified in Policy that any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder engross at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and biodiverse area,	Mods to be considered to address the points.

Consultee	Specific Issues Raised	Council Response/Action
	particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.	
	Had 2: This Policy is encouraging and there is much that is positive, but there needs to be Policy consideration for mitigating recreational disturbance on priority/sensitive habitats.	Mods to be considered to address the points.
	Policy ENV5: Broadly supportive Minor clarifications recommended	Mods to be considered to address the points.
	Policy Infra4 Open Space: There should be a reference added regarding the creation of specific dog walking open spaces, to be located away from the more sensitive sites and from more sensitive areas of new habitat creation. There is the opportunity to implement pollinator and Nightingale corridors, via scrub and flower-rich, low-nutrient grassland, that can be specified in this Policy.	Mods to be considered to address the points.
	Policy SD1: Sediment (BUDS) should be mentioned in this Policy as an	Noted. Not likely to be possible to fully accommodate this request (Subject to further confirmation), other than possible supporting text reference

Consultee	Specific Issues Raised	Council Response/Action
	alternative to hard sea defences where possible.	
	<p>Policy SD7: Add a new sentence to clarify that contaminated sites can be biodiverse brownfield habitat. For example:</p> <p>"Where a site is contaminated the Council will not permit development if it of biodiversity value."</p>	Mods to be considered to address the points.
	<p>Policy ENV2: Should specify the need to address recreational disturbance and to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR/SSSI are mitigated for and covered by an HRA.</p> <p>It is suggested to add wording such as: "Explore opportunities for coastal adaptation measures and Beneficial Use of Dredged Sediment (BUDS), for example through saline lagoon creation.</p> <p>Policy should specifically include reference to enhancing coastal areas for biodiversity.</p>	Mods to be considered to address the points.

Consultee	Specific Issues Raised	Council Response/Action
	Policy ENV3: We welcome this Policy. We suggest that the possible development of a biodiversity enhancement toolkit for developments could prove useful.	Support noted
	Policy GB2: A sentence needs to be added to Policy GB2 to clarify that biodiverse brownfield and open mosaic habitat on previously developed land will not be considered appropriate for new development.	Mods to be considered to address the points.
	Policy SD4: It is suggested to use recycled materials as soil substrate with drought tolerant beds and planting. A mention of pollen and nectar rich plants and shrubs (pollinator planting) would be a welcome addition. The Beth Chatto housing estate model – dry gardens with planting of native (and potentially non-native) plants, could be referenced.	Mods to be considered to address the points.
	Policy E1: We suggest adding provision for brownfield habitat enhancements across the sites. For example, adding to 2d) to read: "Provide brownfield habitat enhancements, and environmental improvements such as to the quality	Mods to be considered to address the points.

Consultee	Specific Issues Raised	Council Response/Action
	of open spaces, landscaping, roads, drains, and communication infrastructure;	
	Policy SP1 Multiple minor additions requested	Mods to be considered to address the points.
	Policy Thun4: Some thought needs to be given to the recreational impact on the grasslands and SN Ancient Woodlands. Dogs and mountain bikes are a considerable issue in the woodlands some of which are SSSIs. There is opportunity here to implement pollinator and Nightingale corridors through creation of scrub and flower-rich/low-nutrient grassland.	Mods to be considered to address the points.
The Woodland Trust	Commend CPBC for producing a Local Plan with clear ambitions to enhance biodiversity, strengthen green infrastructure, and address climate resilience. However, to ensure that the Plan delivers genuine nature recovery and meets the challenges ahead, they recommend strengthening several policies to better protect irreplaceable habitats, deliver higher environmental gains, and embed long-term tree strategy objectives.	<p>Support noted. Largely considered these matters are already covered indirectly or by other means.</p> <p>However, two proposed changes in response</p> <ul style="list-style-type: none"> • Policy ENV2 reference to importance of connectivity of natural features • New supporting paragraph proposed to Policy ENV3 in relation to irreplaceable habitats.

10. Developers and Landowners

10.1 Developers and landowners provided perspectives on:

- The suitability and deliverability of proposed site allocations.
- Infrastructure contributions and viability assessments.

10.1 Regulation 18 Consultation: Main Issues from Developers and Landowners and Council Responses

These are a selection of the more significant issues from 'Developers and Landowners' from the Regulation 18 stage consultation which took place between 22 July and 16 September 2024.

Consultee	Specific Issues Raised	Council Response/Action
Nexus Planning on behalf of the Salvation Army Trustee Company.	<p>Nexus Planning represent the Salvation Army in regard to GB8.</p> <p>Their response draws on what they see as potential positives that developing that site would entail.</p> <p>They also support Option 3 as a spatial strategy or using the housing target set out in the Governments proposed NPPF changes</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB8 – Land south of Hadleigh is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore, it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However, there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. Historic England object to the allocation of this site, which includes the Roman Fort at Hadleigh, a scheduled monument (LEN 1002171). The site is also adjacent to Hadleigh Castle, an enclosure castle with an associated dam and mill, also a scheduled monument (LEN 1014795), as well as the Heavy Anti-Aircraft Gunsit on Sandpit Hill, another scheduled monument (LEN 1019663). A Heritage Impact Assessment has also identified the site should not be developed in its totality. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
AA Homes & Housing	<p>AA Homes & Housing represent land at Ferry Road/Brook Road. Their representation includes combining housing with developer contributions to both bolstering flood defences and designing in a sustainable manner. They also suggest the land could be available for</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to</p>

Consultee	Specific Issues Raised	Council Response/Action
	employment instead of housing.	<p>allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. <p>The site was assessed through the SLAA and excluded as unsuitable for development. It is in an area of constraints within the designated South Benfleet Playing Fields, a large area of open space to the south of Benfleet. It is in Flood Risk Zone 3b (Tidal and Fluvial) high risk of flooding. The same constraints would also apply to employment uses on the site.</p> <p>South Benfleet Playing Fields is a publicly accessible recreational space on the edge of Canvey Island that plays a key role in both community amenity and flood risk management and therefore is protected for its environmental functions.</p> <p>Key protection and development constraints include the following:</p> <ul style="list-style-type: none"> The playing fields are a popular recreational facility for those living in South Benfleet due to the limited amount of amenity green space within the urban area itself. To the west is a designated Local Wildlife Site. It is within 100m of the designation.

Consultee	Specific Issues Raised	Council Response/Action
		<ul style="list-style-type: none"> The site is also located within the designated South Benfleet conservation area which has been shaped by a variety of factors, notably the creek and fishing port, the church, the railway, the 19th-century housing that developed close to the station, and the road through to Canvey Island. Within the conservation area there are listed buildings, tree preservation orders, locally listed buildings, rights of way and the Green Belt. The playing fields act as a buffer against flooding by providing temporary storage for runoff water. The site is part of an established local character that includes a semi-rural and coastal landscape, ancient trees, and biodiversity interest. <p>2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process.</p> <p>3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Phase 2 Planning on behalf of Vistry Homes	<p>Phase 2 Planning represent the site Land south east of Daws Heath (Brook Farm) GB10</p> <p>Phase 2 notes the potential for enhancing biodiversity and improving connectivity around woodlands in Daws Heath.</p> <p>The response calls for the Council to utilise the 685 figure from the NPPF consultation.</p> <p>Furthermore, they believe the response supports the LHNA identification for larger a larger number of properties.</p>	<p>Although the site benefits from a planning permission, the Council does not consider this to automatically justify its allocation in the Local Plan. The Council's spatial strategy seeks to focus development in sustainable urban locations and to optimise brownfield land opportunities before considering Green Belt release. The Brook Farm site, located within a sensitive part of the Green Belt, is not aligned with this strategy. The Council has concerns regarding the site's planning merits and its impact on the integrity of the development strategy.</p> <p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The Housing Requirement:</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a local plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints and local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>infrastructure network, alongside with none of the neighbouring authorities able to assist in meeting need the council will not be able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>Rigorous Site Selection Process:</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. The sub-area is considered to play a critical role in respect of the wider Green Belt Parcel number 8 that the site sits within. If the sub-area were released the Daws

Consultee	Specific Issues Raised	Council Response/Action
		<p>Heath Ring Locally Important Strategic Green Belt Area would be effectively punctured and Daws Heath and Hadleigh would coalesce.</p> <p>3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded.</p> <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints:</p> <p>While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services.

Consultee	Specific Issues Raised	Council Response/Action
		<ul style="list-style-type: none"> • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Collective Planning on behalf of Blue Square Homes	<p>Collective Planning responded on behalf of Blue Square Homes who represent the site Land to the South of the Chase (GB12)</p> <p>They believe that the housing target of 255 units pa is unjustified and instead suggest following the consultation version of the NPPF at 685 units pa.</p> <p>They also requested increasing the average density of residential development.</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as south of The Chase (GB12) is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement;</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a local plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints and local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside with none of the neighbouring authorities able to assist in meeting need the council will not be able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. 3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints:</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Boyer Planning on behalf of Vistry Group	<p>Boyer represent Land at Glyders.</p> <p>Boyer supports the release of Green Belt land within the borough including their site.</p> <p>They also support the use of the consultation version of the NPPF and that the current housing land supply is very low and artificially constrained.</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>They believe that release of their site from the green belt would assist in the housing shortfall.</p>	<p>allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB 31 Land at Glyders is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. <p>The site is bounded on three sides by residential development, with the Hadleigh Castle and Marshes Historic Natural Landscape to the east. A Site of Special Scientific Interest (SSSI) sits adjacent to the south-eastern corner of the site within the Historic Natural Landscape. The land slopes upwards in both a west to east direction and north to south, resulting in the</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>south eastern section of the site being highly prominent which makes development of the site challenging.</p> <p>2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process.</p> <p>3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded.</p> <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options.

Consultee	Specific Issues Raised	Council Response/Action
		<ul style="list-style-type: none"> Minimize the loss of high-value Green Belt land and protect the character of existing communities. Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Carter Jonas	<p>Carter Jonas represent Land at Oak Tree Farm. They do not support an Urban only approach and instead support the current standard method figure. However, under the proposed NPPF changes they support using a 13,700 housing figure. They support a Green Belt release including their site.</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB9 Oak Tree Farm is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p>

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		<p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. 3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p>

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		<p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Gladman Developments	<p>Gladman represent the site Land at Glebelands (GB4)</p> <p>Gladman support the use of the NPPF consultation housing target.</p> <p>Gladman supports a review of the Green Belt boundaries and</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>believe they should not constrain development. Gladman does not support an urban only development option.</p>	<p>housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB4 - Glebelands is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue</p>

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		<p>infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. 3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative

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		<p>impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded.</p> <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. <p>Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements</p>
McCarthy Stone	McCarthy Stone supports delivering homes specifically	The Council acknowledges McCarthy Stone's support for delivering specialist housing for older people and recognizes the and social benefits.

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	<p>specialist homes for older people.</p> <p>They support benefits for specific housing for older people including economic and social aspects.</p> <p>They do not support a higher level of BNG than 10%.</p> <p>They support including a standalone policy actively support the delivery of specialist older housing with good access to services and facilities.</p>	<p>The Council also welcomes support for a standalone policy to promote specialist older persons' housing with good access to services and facilities.</p> <p>The Plan contains a standalone Policy addressing Specialist Housing which accords with the NPPF and the PPG to meet the needs of older people and promote housing with good access to services and facilities</p> <p>All new homes will be delivered in accordance with accessibility standards as follows:</p> <p>100% of all new homes will be built to standard M4(2);</p> <p>10% of all new homes will be built to standard M4(3).</p> <p>Proposals that contribute towards the delivery of 1,056 retirement/sheltered homes and 594 extra care units for older people over the plan period in locations with good access to shops and services are supported.</p> <p>The Council maintains its commitment to enhancing local biodiversity in line with national policy and local priorities.</p> <p>Biodiversity Net Gain (BNG)</p> <p>A policy has been developed in the Plan dealing with BNG: Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain. The requirement is for 10% BNG on all applicable brownfield sites; and 20% on all applicable greenfield sites.</p> <p>The Environment Act 2021 mandates that most developments should deliver at least 10% BNG, but Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing</p>

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		<p>has indicated it is possible to secure 20% BNG on sites to improve contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex.</p> <p>The majority of sites allocated in the plan are brownfield sites, so it is unlikely that the Greenfield uplift will affect a significant number of sites coming forward over the plan period.</p>
NHS Property Services.	<p>NHS Property Services at this stage focused on highlighting priority areas important to embedding the needs of the health services into the local plan in a way that supports sustainable growth.</p> <p>They recommend that with large developments there must be appropriate funding leveraged through developer contributions towards health and care facilities.</p> <p>NHSPS require flexibility to the use of its estates to enable patient care and support key healthcare strategies.</p> <p>NHSPS support policies that promote carbon neutral</p>	<p>The Council acknowledges NHS Property Services' (NHSPS) priorities and supports the integration of healthcare needs into the Plan.</p> <p>We recognize the importance of securing appropriate developer contributions for health and care facilities in areas of significant growth.</p> <p>The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development including health care facilities.</p> <p>Policy Infra3 – Improving Health and Wellbeing. The Council will work to improve the health and wellbeing of residents by: Working in partnership with the NHS and Public Health to ensure residents can access high quality primary and secondary health care services and that new and improved services are put in place, where appropriate, to serve the growing population.</p> <p>Policy Infra3 requires mitigation to be provided and/or secured by planning obligations or by the Community Infrastructure Levy (CIL) towards new or enhanced health facilities from developers where new housing development would result in a need for health care facilities.</p>

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	<p>development and policies that create healthy developments. They also request that the integrated care board analyse any potential site allocations involving NHS sites.</p>	<p>We also note NHS Property Services' request for flexibility in estate use to enhance patient care and align with healthcare strategies.</p> <p>The Council supports policies promoting carbon-neutral and healthy developments and welcomes collaboration with the Integrated Care Board in assessing potential site allocations involving NHS sites. Policy SD4: Net Zero Carbon Development which addresses the issue. All new buildings must be designed and built to be Net Zero Carbon in operation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match annual energy use.</p> <p>We look forward to continued engagement to ensure health infrastructure aligns with sustainable growth objectives.</p>
Ceres Property on behalf of Privo	<p>Ceres Property represent the owners of area GB12 (The Chase).</p> <p>They support the Council utilising the governments standard methodology for housing delivery.</p> <p>They support delivering this many houses to deal with affordable housing issues and meeting local need.</p> <p>They also support a Green Belt review to enable more development within the borough.</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB12 The Chase, is not proposed for allocation in the Plan for the following reasons:</p>

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		<p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p>

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		<p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. A Local Wildlife Site designation covers most of the site and includes an abundance of mature trees and landscape. Removal of these trees could have a negative impact on biodiversity and on the quality of the landscape. The site also contains playing fields used by the nearby USP College. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. 3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded.

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		<p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Ceres Property on behalf of	Site GB14 (Land South of Daws Heath Road) –	Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing

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Rainier Developments	<p>The site is promoted for allocation for approximately 58 dwellings, including market, affordable, and self-build housing, alongside public open space and ecological enhancements.</p> <p>The submission argues that exceptional circumstances exist to justify removal of the site from the Green Belt, in light of the borough's acute and unmet housing needs, the sustainability of the location, and the limited availability of suitable non-Green Belt sites.</p> <p>The site is considered suitable, available, and deliverable, and offers a logical and contained extension to the existing settlement of Thundersley, which is identified as one of the borough's most sustainable locations for growth.</p> <p>A recent appeal relating to the site was dismissed due to the</p>	<p>provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB14 – Land South of Daws Heath Road, is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p>

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	<p>absence of “very special circumstances”</p> <p>The submission supports Option 2a as the most realistic and deliverable borough-wide development strategy, enabling a balanced and sustainable approach to growth including Green Belt release where justified.</p>	<p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been

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		<p>considered for allocation. An outline application (23/0104/OUT) for up to 58 dwellings with associate infrastructure was dismissed in July 2024. Planning balance favoured refusal. The benefits (e.g. housing, affordable housing, biodiversity gains) did not clearly outweigh the Green Belt and other harms. Development would urbanise a generally open, countryside-feel and erode the rural setting of 137 Daws Heath Road, a locally listed 18th-century cottage.</p> <p>2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process.</p> <p>3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p>

Consultee	Specific Issues Raised	Council Response/Action
		<p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
DHA Planning on behalf of Spurdown Ltd	<p>DHA represents the site Johnsons Factory on London Road.</p> <p>DHA support the draft vision and wish to deliver sustainable homes that optimise land in brownfield urban areas.</p> <p>They strongly object to the LHNA figure and would suggest that it is misleading in the context of a potential standard methodology figure of 685.</p> <p>They believe their site is capable of delivering 60 new homes instead of the listed 39.</p> <p>Net gain in excess of the mandatory 10% requirement must be clearly justified.</p>	<p>The site is located in the Hadleigh Town Centre. Proposed CPP Policy: Had1 Regeneration and investment into Hadleigh Town Centre will provide for at least 365 new homes, of which at least 200 homes and commercial floor space will be beyond 2037. This will be delivered via a new Hadleigh Town Centre Master.</p> <p>The Johnsons Factory site on London Road has been assessed in the 2025 SLAA as suitable and included the housing trajectory supply. It is identified as one of the five developable sites in Hadleigh Town Centre with a capacity for at least 165 new homes. It is anticipated that the master plan will identify an additional 200 homes for delivery beyond 2037. This assumption is based on the known suitability of Hadleigh Town Centre as a development location, and the number of buildings and spaces within the centre where additional development could be delivered. Recent evidence on design densities indicates that the site has the potential to deliver a higher density typology development with increased number of homes subject to detailed design considerations.</p> <p>Local Housing Need</p>

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		<p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints and local infrastructure capacity, with none of the neighbouring authorities able to assist in meeting need the council will not be able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision</p> <p>Biodiversity Net Gain (BNG)</p> <p>A policy has been developed in the Plan dealing with BNG: Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain. The requirement is for 10% BNG on all applicable brownfield sites; and 20% on all applicable greenfield sites.</p> <p>The Environment Act 2021 mandates that most developments should deliver at least 10% BNG, but Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% BNG on sites to improve contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex.</p> <p>The majority of sites allocated in the plan are brownfield sites, so it is unlikely that the Greenfield uplift will affect this sites.</p>

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Whirledge and Nott	<p>Whirledge and Nott represent the landowner of Land north of Grasmere Road and Borrowdale Road (GB15)</p> <p>They support using the currently implemented standard methodology for 355 homes pa.</p> <p>They believe attempting to justify exceptional circumstances to lower housing need as inappropriate and unjustified.</p> <p>They support a Green Belt review and release of their site for development.</p> <p>They believe the NPPF consultation must be taken into account for a potential increase to the housing target.</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB15 – Land North of Grasmere Road, is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p>

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		<p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p>

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		<p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. Grasmere Road Pastures (PLoWS 8) is a potential wildlife site that lies immediately north and west of the site. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. 3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints:</p> <p>While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p>

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		<p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Peacock and Smith on behalf of Morrisons Supermarkets Ltd	<p>Peacock and Smith represent WM Morrisons Supermarkets. They support the release of Land to the east of Roscommon Way (GB1) from the Green Belt.</p> <p>They reference the governments proposed changes to the NPPF and suggest that an urban first approach will not meet the Council's vision and not achieve emerging national planning policy.</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB1 West of Caney Road, is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure.</p>

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		<p>The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p>

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		<p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. The site is located on Canvey Island, within Flood Risk Zone 3 high risk of flooding. It is also within a local wildlife site managed as an RSPB reserve. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints:</p> <p>While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The</p>

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		<p>ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Persimmon Homes	<p>Persimmon supports the release of GB2, GB5 and GB12 from the Green Belt alongside other Green Belt sites.</p> <p>Persimmon supports the Castle Point Plan Vision and encourages development within the borough, believing development will enable</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to</p>

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	<p>necessary infrastructure investment.</p> <p>The response highlights a concern that the suggested potential site allocations are all small-scale urban sites, which may not provide the required infrastructure investment for areas like Canvey Island and Benfleet.</p> <p>They believe option 3 is the only viable growth strategy and they believe it is the most effective way to meeting housing need. However, they argue the housing target should be 13,700 as a starting point as per the NPPF consultation set out by the new Government.</p> <p>They do not support a BNG target of higher than 10% due to viability.</p>	<p>allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The sites identified as GB2 – East of Canvey Road, GB5 – West of Benfleet (Jotmans) and GB12 – The Chase, are not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need</p>

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		<p>in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. 3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative

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		<p>impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements. <p>Biodiversity Net Gain (BNG) A policy has been developed in the Plan dealing with BNG: Policy ENV3 –</p>

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		<p>Securing Nature Recovery and Biodiversity Net Gain. The requirement is for 10% BNG on all applicable brownfield sites; and 20% on all applicable greenfield sites.</p> <p>The Environment Act 2021 mandates that most developments should deliver at least 10% BNG, but Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% BNG on sites to improve contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex.</p> <p>The majority of sites allocated in the plan are brownfield sites, so it is unlikely that the Greenfield uplift will affect a significant number of sites coming forward over the plan period</p>
CODE Development Planners on behalf of Land Development Limited	<p>Code Planners represent Land regarding the site Land East of Rayleigh Road (GB13). CODE argues that there are no exceptional circumstances in Castle Point that would justify deviating from the standard method for assessing housing needs. The evidence from the withdrawn Castle Point Local Plan (2018-2033) supports the ability to meet housing needs through urban sites and Green Belt releases.</p> <p>A reduced housing need figure would negatively impact</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB13 East of Rayleigh Road, is not proposed for allocation in the Plan for the following reasons:</p>

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	<p>housing affordability and the delivery of new community infrastructure. Therefore, the plan should aim to provide a minimum of 7,100 new homes over a 20-year period, aligning with the current national planning policy context. The response notes the government's proposed reforms to the NPPF and the standard method, which would significantly increase the local housing need figure for Castle Point to 685 dwellings per annum, up from the current 355. These new targets will be mandatory, removing the option for exceptional circumstances. The proposed transitional arrangements mean the Council must account for the revised NPPF policies once implemented. This will impact how housing land supply is calculated before adopting a new local plan, emphasizing the need for the Council to prepare for these changes.</p>	<p>The Housing Requirement The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p>

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	<p>This Land Development Limited is open to amending the layout of the development in the southeast corner of the site to make it more visually open from Daws Heath Road. This adjustment aims to bring Thundersley closer to Daws Heath while maintaining their status as separate settlements.</p>	<p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs. Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. 3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. <p>Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints:</p>

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		<p>While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.
Pegasus Group on behalf of Redrow Homes	<p>Pegasus Group submitted this response on behalf of Redrow Homes representing Land West of Benfleet (South of Jotmans Lane) ((GB5)). Redrow Homes, in collaboration with Persimmon Homes and other landowners,</p>	<p>Castle Point Council remains committed to preparing a Plan that addresses housing need. However, achieving this in full within the administrative boundary remains challenging due to the constraints. The level of housing provision that this Plan will deliver therefore reflects the size, character and capacity of the Borough.</p> <p>Castle Point Borough Council has undertaken a robust and evidence-based approach to identifying the most appropriate and sustainable locations for</p>

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	<p>is working on a comprehensive development for the site identified as Redrow Homes expresses significant concerns about the Council's ability to produce a sound Local Plan, noting a preference for a low growth strategy in the Issues and Options (IAO) document. They suggest there are deficiencies in the housing requirement calculations, growth options, and assumed housing supply. The response notes that the potential site allocations for Benfleet are all urban sites. Redrow Homes argues that the Council should consider additional site allocations in the Green Belt, including GB5, to address the availability and capacity issues of urban sites. They believe that preparing the new Plan with a housing requirement of only 3,727 homes would result in an unsound Plan and delay strategic, plan-led growth. This would lead to a continued lack</p>	<p>housing development within the borough. While a significant number of sites have been promoted through the Call for Sites process, it is not possible to allocate all sites due to a range of constraints and the need to balance growth with environmental protection, infrastructure capacity, and community needs.</p> <p>The site identified as GB15 West of Benfleet (Jotmans), is not proposed for allocation in the Plan for the following reasons:</p> <p>The Housing Requirement</p> <p>The standard methodology (SM) formulae identifies the minimum annual housing need figure (LHN). It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a Local Plan.</p> <p>The PPG -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.</p> <p>The PPG recognizes that the standard method should be used to assess housing needs. However there may be specific circumstances in which an alternative approach could be justified.</p> <p>Under the revised December 2024 SM Castle Point's annual housing need has been assessed at 701 homes per year. However, due to local constraints, including Green Belt coverage (55% of the borough), environmental constraints, local infrastructure capacity, concerns over suitable and sustainable access to sites and the need to protect our green and blue</p>

Consultee	Specific Issues Raised	Council Response/Action
	<p>of appropriate housing and employment opportunities and fail to deliver much-needed infrastructure.</p>	<p>infrastructure network, alongside none of the neighbouring authorities able to assist in meeting need, the council is not able to meet its unconstrained need in full. A housing requirement figure lower than the unconstrained LHN is therefore considered to be justified in Castle Point.</p> <p>The need to meet the higher housing target does not override the need for a balanced and sustainable approach to housing provision.</p> <p>The Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs.</p> <p>Prioritising urban regeneration over new development on protected land aligns with national planning guidance.</p> <p>The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.</p> <p>Rigorous Site Selection Process</p> <p>The Council has followed a structured and transparent methodology to assess the suitability of sites for development. This includes:</p> <ol style="list-style-type: none"> 1. Strategic Land Availability Assessment (SLAA): This process has identified sites that are available, suitable, and achievable within the plan period. Sites that do not meet these criteria have not been considered for allocation. 2. Green Belt Review: A Green Belt Review has been undertaken and the findings considered as part of the plan making process. 3. Sustainability Appraisal (SA): A detailed assessment has been undertaken to evaluate the social, economic, and environmental

Consultee	Specific Issues Raised	Council Response/Action
		<p>sustainability of each site. Sites that would result in significant negative impacts, such as excessive strain on infrastructure, loss of high-value ecological assets, or increased flood risk, have been excluded. Further details regarding the evolution of the GB site assessments will be set out in a separate topic paper.</p> <p>Balancing Growth with Infrastructure and Environmental Constraints: While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection. Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p> <p>Prioritizing the Most Sustainable Sites</p> <p>The allocated sites in the Plan represent the most sustainable and deliverable options, ensuring that housing growth occurs in locations that:</p> <ul style="list-style-type: none"> • Are well-related to existing settlements and services. • Have good access to public transport and sustainable travel options. • Minimize the loss of high-value Green Belt land and protect the character of existing communities. • Align with national and local planning policies, ensuring that the housing strategy is justified, effective, and consistent with government requirements.

10.2 Regulation 19 Consultation: Main Issues from Developers and Landowners and Council Response

These are the key issues considered to be more significant from 'Developers and Landowners' from the Regulation 19 stage consultations (Aug-Sept 2025 and Oct-Dec 2025). The full list of representations is published separately and should also be referred to.

Topic or Plan Section	Specific Issues Raised	Council Response/Action
Cross-Boundary Working	<p>Rainier Developments, Privo Land, Richborough Commercial, Inner London Group and Rosconn Group all object on Cross-Boundary Working</p> <p>There is no evidence provided that the Council have based their plan on effective joint working on cross-boundary strategic matters or sufficient Statements of Common Ground.</p>	<p>This is addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.</p>
Green Belt/Grey Belt	<p>Gladmans, Nexus Planning, Hillside Enterprises object to the Council's approach to Green Belt/Grey Belt. Suggest Green Belt should have been released.</p> <p>Taylor Wimpey suggests that Policies GB1 and GB2 are not consistent with the NPPF, and the 2025 Green Belt Review does not consider all land parcels in the Borough and there are significant areas that were not assessed. Persimmon suggests that Policies GB1 is not consistent.</p>	<p>The Council has undertaken a Green Belt Review in accordance with the requirements of the Government's guidance. After a thorough review, backed up by strong 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</p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
		<p>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.</p>
Housing Land Requirements	<p>Issues raised by several developers/land owners (Discovery Land & Planning, Privo Land, Persimmon Homes, Gladmans, Inner London, Richborough, Nexus, Taylor Wimpey, Rosconn Group, Rainier Developments, King John's Wood Landowners Consortium, Hillside Enterprises) and Ceres Property.</p> <p>Not achieving government housing target as calculated by the Standard Methodology.</p> <p>5 Year housing supply - Not identified as required under NPPF 78. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience.</p> <p>Concerns regarding deliverability of allocated sites within the plan.</p>	<p>Housing need, including standard method, considered through the supporting evidence.</p> <p>Housing Supply: See housing topic paper. Plan to provide for rolling 5-year housing land supply and 17 year housing trajectory. Option 2a was rejected by evidence.</p> <p>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</p> <p>Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August 2025.</p> <p>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:</p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
	<p>Several state a preference for SA option 2a which would see development of 'grey' belt sites.</p> <p>Dove Jeffrey Homes suggests that CPBC is directly undermining the Labour government's desire to get Britain building again and requests government intervention.</p> <p>Discovery Land & Planning suggest that the Plan will not deliver the affordable housing needs identified in the Local Housing Needs Assessment 9June 2025) and also that the trajectory is backloaded</p> <p>Ceres Property support a Green Belt review to enable more development within the borough.</p>	<ul style="list-style-type: none"> the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7 ; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. <p>Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding.</p> <p>Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that "Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations..." The NPPF footnotes set out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas)."</p> <p>While there is a need to deliver new homes, the Council must ensure that growth is sustainable and does not overwhelm existing infrastructure. The ability to deliver supporting infrastructure, such as schools, healthcare facilities, roads, and public transport, has been a key factor in site selection.</p> <p>Additionally, sites with significant environmental constraints, such as flood risk zones, Sites of Special Scientific Interest (SSSIs), or areas with high landscape value, have been discounted. This ensures that housing delivery is achievable while maintaining the borough's environmental quality and infrastructure capacity.</p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
Premium Sustainability Areas (Policy D2)	<p>Gladmans support the Council's proposed approach to seeking higher density in areas in appropriate locations. But do not support the Council's approach or consideration of 'premium sustainability'. Clearly there are locations where higher density is appropriate but such a definition of 'premium sustainability' is not supported or set in national policy.</p>	Noted
Employment Land Requirements	<p>Inner London and Richborough Commercial object to the assertion that there will be a surplus of employment land, particularly industrial land over the plan period. They allege CPBC figures are based upon a baseline labour demand model which has significantly underestimated the need for employment space within the Borough, particularly for industrial uses, and that the Council should be planning for a minimum of 11.9ha of employment</p> <p>They disagree with the soundness of the approach which focuses new commercial provision exclusively towards existing employment designations and town centre sites.</p>	<p>Employment land requirements are stated in paragraph 6.36 'In terms of employment need, data on employment growth indicates that there will be a small surplus of employment land arising over the Plan period of circa 2ha. This is additional to 7.5ha of land that has extant planning consent for employment uses at West Canvey. This means there is a potential surplus of 9.5ha of employment land over the Plan period.' So it is not necessary to identify targets by employment use in the policy.</p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
	<p>They also consider that Policy SP3 should be amended to clearly identify what the employment land target is for different types of employment use (e.g. office use, general industrial use, storage and distribution use).</p>	
The South Essex Economy	<p>Inner London and Richborough Commercial allege that 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.</p> <p>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.</p> <p>In response to issues highlighted around Castle Point's economy, new employment development (for example at Canvey Way) will help provide employment opportunities.</p>	<p>Castle Point's role within a wider South Essex economy is well recognised in the Plan and the development of new floorspace is supported.</p> <p>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 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).</p> <p>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</p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
		<p>Plan's strategy is to optimise and intensify existing employment land, rather than allocating new sites.</p> <p>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.'</p>
Affordable Housing requirements (Policy HOU2)	<p>McCarthy Stone and Churchill Living object to the affordable housing requirement applying to specialist housing for older people, suggesting this is not supported by the Viability Assessment.</p> <p>Gladmans support the proposed approach to affordable housing. Persimmon suggest the policy limits opportunities for affordable housing provision.</p>	<p>Propose to address via an additional paragraph to Policy Hou2 as follows</p> <p><i>6. Where these requirements cannot be met, a fully transparent viability assessment should be provided in line with Part 6 of policy SP4. The Council reserves the right to seek mitigation through e.g. the use of overage clauses, in the event that viability improves prior to the completion of the development.</i></p>
Housing Mix (Policy HOU3)	<p>Gladman support Hou3 and agree that a range of house types are required to meet local requirements and to ensure mixed and balanced communities and they note that house type requirements are informed by the Local Housing Needs Assessment (LHNA).</p>	<p>Additional sentence to HOU3 proposed: <i>To ensure mixed and balanced communities, development will be required to reflect a mix in line with the table above, as far as possible and as an initial benchmark. The needs of specialist housing typologies will differ from generic housing and will be assessed on a case by case basis in line with identified housing need</i></p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
	<p>The limited number of larger homes attributed to Premium sustainability areas is questioned by Persimmon Homes.</p> <p>McCarthy Stone and Churchill Living request the housing mix requirement applies more flexibility to specialist housing for older people.</p>	
Specialist housing for older people	<p>McCarthy Stone and Churchill Living request the benefits of specialist housing for older people receive more recognition; by mentioning in Policy INFRA3 and removing the requirement of Health Impact Assessments (HIA).</p> <p>Habinteg Housing Association believe that Policy Hou4 is an exemplary policy that sets a high ambition for providing homes for older and disabled people and avoids ambiguity. Anchor Hanover Group also support the policy, noting that it sets clear targets.</p>	Changes not considered necessary in this case (although other changes to Policy Hou2 and Hou3 agreed in response to representations from the same respondent)
Policy T2 Highways Impacts	Richborough Commercial and Taylor Wimpey object that CPBC have set a lower bar than the NPPF regarding unacceptable highways impacts.	Transport policies supported by evidence and engagement with the Highways Authority.

Topic or Plan Section	Specific Issues Raised	Council Response/Action
	Hillside Enterprises suggest the Plan exaggerates the extent to which the highway network is at capacity.	
Infrastructure Delivery Plan	Inner London prefer Scenario 2, which reflects development across both urban brownfield and a limited number of Green Belt / Grey Belt sites, and reflects Option 2a for Policy SP3 within the Sustainability Appraisal	Noted, although this was not considered the most sustainable option by the Plan.
Policy ENV1	<p>Inner London object to the requirement for all development proposals to "seek to protect and enhance key natural / semi-natural and historical features" is considered to put an unnecessary burden on developments and should only be required where feasible.</p> <p>Taylor Wimpey states this policy does not align with the NPPF/</p>	<p>The Plan accords with the NPPF overarching objectives, including to 'Protect and enhance our natural, built and historic environment' (NPPF 8c).</p> <p>NPPF paragraph 20 is clear that strategic policies should ensure 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure' and paragraph 136 is clear that existing trees should be retained wherever possible.</p> <p>Public authorities have a legal duty under the Environment Act 2021 to consider what they can do to conserve and enhance biodiversity as part of their decision-making. This includes both protecting existing features and working to improve their condition.</p> <p>In line with national policy, statutory bodies emphasise the retention, conservation, and enhancement of existing and historic features.</p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
Policy ENV3 and Biodiversity Net Gain	Gladman, Taylor Wimpey, Persimmon and Inner London Group object to 20% biodiversity net gain requirement for greenfield developments and query if it is justified by evidence	<p>As set out in paragraph 18.29 'Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites</p> <p>The 20% BNG target aligns with the wider Essex ambitions for 20% Biodiversity Net Gain to support nature recovery and delivery of the Local Nature Recovery Strategy for Essex'. 20% is supported by Natural England and the results of the Plan Reg 18 consultation.</p>
Policy ENV6 Best and Most Versatile Agricultural Land	Taylor Wimpey object to this policy and suggest this policy goes beyond national guidelines	Noted
Policy SP1 Supporting Enhancement of the Borough's Green Spaces	Taylor Wimpey object to this policy and suggest this policy goes beyond national guidelines	Noted
Policy DH2 Coalescence of Settlements – Daws Heath	<p>Hillside Enterprises object to this policy</p> <p>Ceres Property are not supportive of this policy due to not conforming with the NPPF.</p>	<p>Noted</p> <p>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.</p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
Policy D3 Materplanning	Persimmon suggest that clear criteria need to be provided of when the Council would expect a masterplan to be provided, the detail that a masterplan would need to cover, and the approval process for a masterplan.	Noted
Policy C1 Canvey Town Centre	Essex Architectural Planning Limited do not believe this is a practical or achievable policy	Noted
Specific Sites	<p>Specific sites promoted (listed below), and the conclusions leading to their exclusion are questioned.</p> <ul style="list-style-type: none"> • GB2 • GB4 • GB5 • GB12 • GB13 • GB14 • Land east of Kings Park Village • East of Rayleigh Road, Thundersley 	<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green Belt options were considered in the Green Belt Assessment evidence.</p>
Net Zero Carbon Development (Policies SD4 and SD5)	Gladman, Persimmon and Taylor Wimpey do not consider that the Council's policy is necessary as there is already a national approach set out in Building	As set out in reasoned justification paragraphs, this has been informed by work at County level.

Topic or Plan Section	Specific Issues Raised	Council Response/Action
	Regulations and in the form of the Future Homes Standard	
Water Efficiency Standards (Policy SD9)	<p>Gladman object to lower water efficiency standards. State that the water standard is best calculated at a national level in accordance with building regulations.</p> <p>Taylor Wimpey object to the requirement that <i>'All new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.'</i> since they state that Water Companies have an obligation under the Water Industry Act to connect to the public sewerage network</p>	<p>Noted.</p> <p>Policy SD9 supported by evidence, noting that Essex is a water stressed area.</p>
Process	One respondent alleged that significant documents were produced in August 2025 and were neither available to the committee on 23rd July 2025 when the Reg 19 was unanimously voted through!	<p>Noted.</p> <p>Note that the Plan was subject a second six-week consultation from 24/10/2025 to 05/12/2025.⁷</p>

Topic or Plan Section	Specific Issues Raised	Council Response/Action
	Nor publicly available / displayed or notified to the residents and or businesses of Castle Point.	

11. Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Consultation Feedback

11.1 There were 53 comments on the SA/SEA at regulation 19 stage, predominantly from residents plus a handful of developers and Natural England. The main issues raised are summarised below. The overwhelming majority of comments were concerned with the assessment of strategic options for growth and consideration of North West Thundersley as a specific option.

Specific Issues Raised	Council Response/Action
Site Options <ul style="list-style-type: none">Suggestions by residents that the SA hasn't considered all site options (particularly NW Thundersley – see below)	All reasonable option sites were considered in the Sustainability Appraisal (SA) (and in the Strategic Land Availability Assessment). Notably Annex A of the SA 'Detailed Assessment of Development Option Sites' North-West Thundersley see below.
North West Thundersley: <ul style="list-style-type: none">Suggestion by many respondents that NW Thundersley was not adequately assessed, overly negative or even not considered as a strategic option, andComments by developers that the assessment lacks rigour and negative scores against NW Thundersley are not justified, particularly in relation to:<ul style="list-style-type: none">Biodiversity constraintsValue of agricultural landViability and safety of access, and the extent to which is an SA matterNoise impacts and extent they can be mitigated	North-West Thundersley was considered but not preferred. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Where there are negative elements to the assessments, these are based on evidence and on the ground constraints; and are fully explained and justified in the SA. The SOCG between CP and ECC and the August 2025 North West Thundersley transport evidence also set out the reasons site not currently a preferred alternative for allocation.

Specific Issues Raised	Council Response/Action
Options and Alternatives <ul style="list-style-type: none"> Comment by a developer that The SA is not sufficiently clear regarding the selection of reasonable alternatives for consideration, nor transparent regarding the selection of preferred options or preferred approaches. 	<p>Reasonable alternatives have been considered. Section 4 of the SA is 'The Assessment of the Plan Policies, Strategy Reasonable Alternative Options' As stated, <i>'This SA assesses each chapter, including all policies and relevant supporting text and reasoned justification, as well as alternative approaches where deemed 'reasonable' i.e. realistic and distinctly different from the preferred approach.'</i> <i>'Assessment options and conclusions have evolved since the Scoping Report due to several factors, such as emerging evidence and factors of consideration, the emergence of wider comparisons, as well as detailed site-based analysis revealing more detail regarding constraints, etc.'</i></p> <p><i>'The assessment of reasonable alternative option sites (Section 5) was an assessment of all reasonable alternative sites. These were assessed predominantly against mathematically measurable indicators (e.g. distances and overlap with planning constraints). There were generally several indicators for each of the twenty objectives, ensuring a very thorough assessment.'</i></p> <p>As set out in section 3.1.2, the SA methodology implicitly aligns with the Planning Practice Guidance. Reasonable alternatives are the realistic options explored by the when shaping the policies within a plan that are both realistic and deliverable. Where relevant, alternatives for policy directions have been assessed and documented alongside each appraisal, including the rationale for their rejection or non-progression.</p> <p>Section 5 'The Assessment of Option Sites' sets out that the section <i>'explores the sustainability of all sites submitted for</i></p>

Specific Issues Raised	Council Response/Action
	<p><i>allocation, or otherwise considered a reasonable option for allocation.</i>' Section 5 also highlights the close relationship and cross-reference to other plan evidence, particularly the SLAA 'sieving' out sites for consideration as allocations within the Plan, with further exploration within this SA. Annex A of the SA sets out detailed assessment of development option sites highlighting the relevant strengths and weaknesses against the 20 SA objectives which has contributed towards site selection.</p>
<p>National Standard Method Housing Figure</p> <p>Suggestion by developers that the SA is too dismissive of government policy on meeting housing need when it states the following in relation to the government standard method figure 'In practical reality it doesn't represent a reasonable option since these numbers would not be remotely possible to achieve in the relatively urbanised Borough of 17 sq. miles with a prevailing low-mid density residential character, a plethora of environmental constraint and a high proportion of green belt which mostly meets at least one of the national green belt purposes to a strong degree.</p>	<p>The National Standard Method figure is fully assessed against all twenty SA objectives on pages 126 to 146 in Section 4.3 of the main SA Report.</p>
<p>Meeting Development Needs and Policy SP3</p> <p>Suggestions by developers that</p> <ul style="list-style-type: none"> Reasonable alternatives do not reflect national policy requirements 	<p>The assessment of options for Policy SP3 is clear that option 3 stems directly from the December 2024 NPP, clearly updating since the scoping report in line with national policy requirements.</p> <p>Biodiversity considered in Objective 1. the ecological value of options has clearly been set out throughout the report. Where</p>

Specific Issues Raised	Council Response/Action
<ul style="list-style-type: none"> The SA assessment that more housing equates to more negative impacts upon biodiversity is flawed. The SA assessment that “Green Belt development is less accessible by public transport would exacerbate the car-dependency issue is flawed. Also, that it fails to consider that the low growth option has the potential to increase the need for travel by private car, for example forcing members of the community and employees of local businesses to meet their accommodation needs outside of the Borough, increasing the need to commute by car. The SA fails to properly recognise the importance of ensuring people have access to appropriate, affordable, housing; and affordable housing needs are downplayed. <p>Suggestion by the Home Builders Federation that the assessment of each option as somewhat biased and not robust.</p>	<p>there are negative elements to the assessments, these are based on evidence and on the ground constraints; and are fully explained and justified in the SA.</p> <p>It is considered that the existing centres and 'premium sustainability areas, which typically serve as public transport hubs for inter-connecting routes are clearly the most accessible areas by public transport.</p> <p>Affordable housing is integral element of SA Objective 14.</p>
<p>Green Belt/ Grey Belt</p> <p>Some indicate a preference for option 2a (which includes releasing Grey Belt sites) They allege that the SA fails to appreciate that Grey Belt sites are, by definition, of a lower environmental / ecological quality than Green Belt sites by virtue of Footnote 7 of the NPPF which does not allow parcels to be classified as Grey Belt if its constraints provide a “strong reason for</p>	<p>Grey Belt is implicitly recognised in option 2a in its title 'Release a limited number of approximately 5 Green/Grey Belt sites'. The explicit reference to grey belt distinguishes it from options 1, 3 and 4.</p> <p>Preferences for option 2a is noted, although this was not concluded to be the most sustainable option in the SA.</p>

Specific Issues Raised	Council Response/Action
<p>refusing the development proposed" (Para 11d (i) NPPF 2024). Given the more limited constraints associated with Grey Belt land, it is considered that any potential environmental impacts can be effectively mitigated via S106 contributions.</p>	
<p>Individual site assessments</p> <ul style="list-style-type: none"> Developers dispute the assessment of individual sites, including <ul style="list-style-type: none"> GB12 GB13 GB14 	<p>Noted</p>
<p>Natural England: Agree there is a mix of positive and negative effects for the biodiversity objective. We note that impacts on biodiversity are highlighted as uncertain to negative for some sites and mitigation may be required to make proposals acceptable. Down-the-line project level assessments will be required to develop mitigation measures in greater detail.</p>	<p>Noted.</p> <p>It is agreed and understood that down-the-line project level assessments will be required to develop mitigation measures in greater detail.</p>

12. Habitats Regulations Assessment (HRA) Consultation Feedback

12.1 There were only eight comments on the HRA at regulation 19 stage, all but one (Natural England) from residents. one broad support and a further six appear in practice to be comments more related to the wider plan, albeit three stressing the importance of preserving land for wildlife. The Natural England comments are summarised in the table below.

Specific Issues Raised	Council Response/Action
<p>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 NE would 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 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.</p>	<p>Two minor clarification modifications are proposed to the Plan in response, as follows, as follows:</p> <p>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 avoiding the loss of designated habitat or causing adverse effects on site integrity. This will need to be demonstrated through a project level HRA.</p> <p>Local Plan 21.18 The loss of inter-tidal marshland habitats. The Benfleet and Southend Marshes is designated as a Special Protection Area (SPA) and is</p>

Specific Issues Raised	Council Response/Action
<p>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.</p> <p>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).</p>	<p>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.</p>

13. Equalities Impact Assessment (EQIA) Consultation Feedback

13.1 There were only eleven comments on the EQIA at regulation 19 stage. Three broadly support and a further three appear in practice to be comments more related to the wider plan. The five remaining comments are grouped and summarised in the table below.

Specific Issues Raised	Council Response/Action
<p>Older Persons – A single detailed objection from Essex County Council who welcome references to Supported and Specialist Housing (SSH) and inclusive design principles. But felt the assessment does not fully consider whether the Plan's policies and spatial strategy will meet the housing and accommodation needs of older people, disabled residents, and other groups with support needs. The EQIA could be strengthened by assessing how the Plan supports equitable access to appropriate housing for these groups, particularly in relation to accessible housing standards, the delivery of specialist accommodation, and the role of care-enabled technology and home adaptations in supporting independence.</p> <p>ECC recommends that the Equality Impact Assessment is strengthened to better reflect the evidence base, namely:</p> <ol style="list-style-type: none">1. Expand the assessment of housing needs for older people, disabled residents, and other groups with support needs, drawing on the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025).2. Consider how the Plan's policies and spatial strategy support equitable access to appropriate housing and environments for these groups, including:3. Accessible housing standards4. Delivery of specialist accommodation5. The role of care-enabled technology and home adaptations in supporting independence <p>These refinements will help ensure the Plan is effective in meeting the needs of different groups in the community, in line with the requirements of the Equality Act 2010 – Public Sector Equality Duty and NPPF, paragraph 63</p>	<p>The Essex Supported and Specialist Housing and Accommodation Needs Assessment was published in August 2025, after the Castle Point Plan (Reg 19 version) and its associated EQIA was published for consultation.</p> <p>However, Policy HOU4 of the CPBC Plan supports the supply of Specialist Housing requirements, which is assessed proportionately in the EQIA, based on information available at the time, as having a 'Strong prospect of there being significant positive impacts' for both the 'Age' and 'Disability' protected characteristics.</p> <p>It is also noted that the SSHANA states that 'Prevalence rates for Castle Point for retirement/sheltered housing are lower than for other local authorities in Essex; however, this is likely to reflect that there are two large park homes sites that are expressly promoted to and are for older people'.</p>

Specific Issues Raised	Council Response/Action
Canvey Residents – Perception from two respondents that Canvey had been treated unfairly and residents are thought of unfairly and the area treated as a 'dumping ground'.	<p>There is no discrimination towards Canvey residents.</p> <p>The strategy of the Castle Point Plan is based on regeneration, renewal and development of brownfield sites, of which there is simply more opportunity in Canvey.</p>
Women – Comment from one resident who is interested to know what the plan is to even things up for women on the island and to increase the social isolation that some feel stating "I work from home and find there is nothing for me on Canvey unless I want to join the gym or do a wellbeing class."	<p>The Castle Point Plan is primarily concerned with land use, but includes policies promoting community facilities and infrastructure, good design and accessible facilities that will benefit social isolation for all groups, including women.</p> <p>As an aside, the Essex Wellbeing Service (EWS) works to reduce social isolation by connecting people with a:</p> <ul style="list-style-type: none"> • wellbeing coach • befriending co-ordinator • community agent • local volunteering programme
A single resident comment that "The needs of the many outweigh the needs of the few".	Noted

14. Conclusions

- 14.1 The Castle Point Plan has been subject to substantive engagement and consultation at Regulation 18, and that engagement has shaped the strategic approach to growth set out within it, and the policies.
- 14.2 Inevitably, however, not everyone agrees with the outcomes of that engagement and the direction that the Castle Point Plan has taken, which has been revealed by the Regulation 19 consultation.
- 14.3 There is a good level of support for the plan amongst some residents and some statutory bodies, especially those who support the retention of the Green Belt and the protection and enhancement of the natural environment. There are however other individuals and organisations who have concerns about the Castle Point Plan and its impacts on traffic and infrastructure, and on the level of housing growth in Castle Point.
- 14.4 There are also some people who are advocating for an alternative strategic approach to growth – the location of growth in a single new settlement to the North West of Thundersley.
- 14.5 Careful consideration has been given to the consultation responses received during the Regulation 19 consultation. In some cases it is agreed that proposed modifications on technical matters should be considered as we move forward. However, overall, the Council is satisfied that it is appropriate to move forward with the Castle Point Plan to Examination.
- 15.2 This Consultation Statement will be one of the documents to be submitted to the Secretary of State along with the Castle Point Plan for the Examination in public, and will be a report used by the appointed Inspector to identify the matters that need to be addressed through the examination process.

APPENDICES

Appendix 1 – Castle Point Borough Council Website Landing Page



Castle Point Plan Draft (Regulation 19) Consultation

Overview



Closed 26 Sep 2025
Opened 1 Aug 2025

Contact
Planning Policy
CPPlan@castlepoint.gov.uk

Regulation 19 and why we are consulting you

The Castle Point Plan will set out where new development will be allocated, how much affordable housing will be built and includes policies for considering

[Skip to content](#) [Site map](#)



Castle Point Plan Consultation

We've set out a bold, community-led strategy for sustainable growth across the Borough. The Castle Point Plan will set out where new development will be allocated, how much affordable housing will be built and more up to 2043.

consultation is now open. [Please give us your views](#)



Supporting our residents



Apply for it



Pay for it



Report it



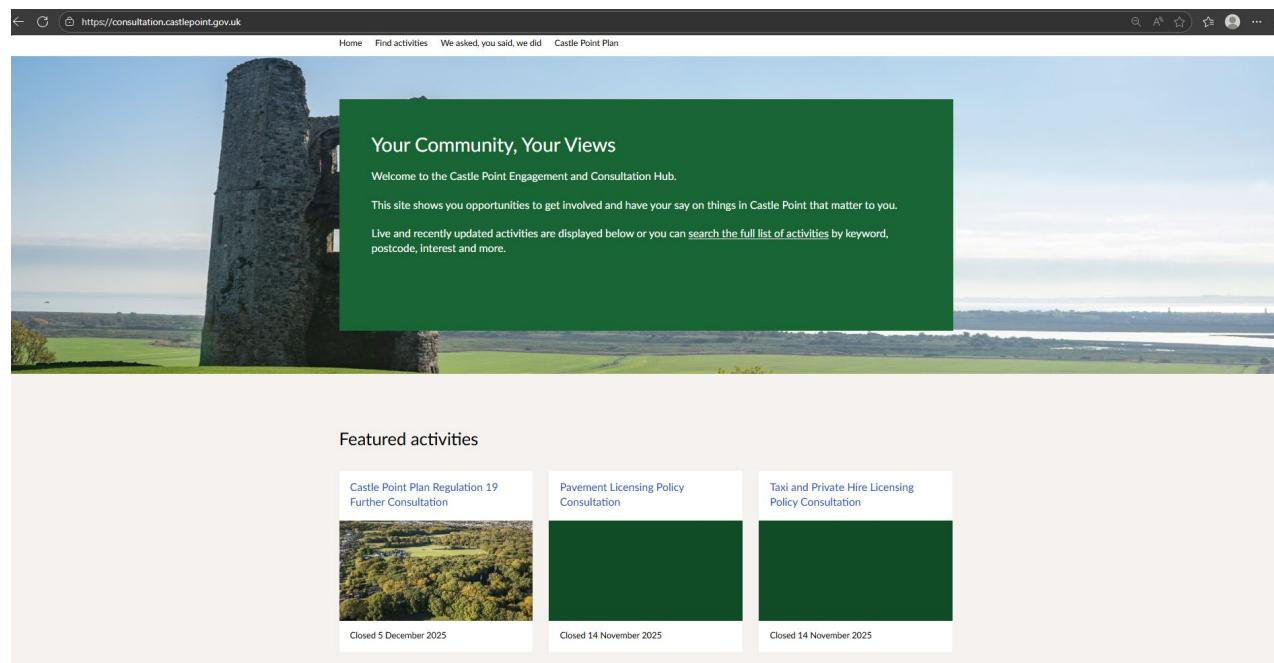
Check your bin date



Consultations

266

Appendix 2 – Citizen Space Landing Page



The screenshot shows a web browser window with the URL <https://consultation.castlepoint.gov.uk> in the address bar. The page features a header with navigation links: Home, Find activities, We asked, you said, we did, and Castle Point Plan. Below the header is a large image of a stone tower, likely a medieval structure, with a green overlay box containing the text 'Your Community, Your Views' and a welcome message. The main content area is titled 'Featured activities' and lists three items: 'Castle Point Plan Regulation 19 Further Consultation' (with a thumbnail image of a landscape, status 'Closed 5 December 2025'), 'Pavement Licensing Policy Consultation' (with a solid dark green thumbnail), and 'Taxi and Private Hire Licensing Policy Consultation' (with a solid dark green thumbnail). The status for the second and third items is 'Closed 14 November 2025'.

Appendix 3 – Council Consultation Events

Events

Thundersley @ Runnymede Hall (Drop in style event)

From 11 Aug 2025 at 19:00 to 11 Aug 2025 at 20:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

Canvey Island @ The Paddocks (Drop in style event)

From 20 Aug 2025 at 19:00 to 20 Aug 2025 at 20:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

Canvey Island @ St Nicholas Church Hall (Drop in style event)

From 22 Aug 2025 at 14:00 to 22 Aug 2025 at 15:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

Hadleigh/Daws Heath @ Hadleigh Old Fire Station (Drop in style event)

From 28 Aug 2025 at 19:00 to 28 Aug 2025 at 20:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

South Benfleet @ Richmond Hall (Drop in style event)

From 3 Sep 2025 at 14:00 to 3 Sep 2025 at 15:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

Canvey Island @ The Paddocks (Drop in style event)

From 18 Sep 2025 at 19:00 to 18 Sep 2025 at 20:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

Thundersley @ Runnymede Hall (Drop in style event)

From 19 Sep 2025 at 14:00 to 19 Sep 2025 at 15:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

Hadleigh/Daws Heath @ Hadleigh Old Fire Station (Drop in style event)

From 24 Sep 2025 at 14:00 to 24 Sep 2025 at 15:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

Canvey Island @ The Paddocks (Drop in style event)

From 25 Sep 2025 at 14:00 to 25 Sep 2025 at 15:30

 [Add to my Calendar \(.ics\)](#)

[► More information](#)

Appendix 4 – Attendance to consultation events

Consultation Event	Date	Number of Attendees
Thundersley	11 th August 2025	11
Canvey Island	20 th August 2025	84
Canvey Island	22 nd August 2025	14
Hadleigh	28 th August 2025	25
South Benfleet	3 rd September 2025	12
Canvey Island	18 th September 2025	12
Thundersley	19 th September 2025	6
Hadleigh	24 th September 2025	37
Canvey	25 th September 2025	19

Appendix 5 – Letter and Email sent to the Castle Point Plan mailing list

Castle Point Plan Regulation 19 Consultation 1 August 2025 to 26 September 2025

On 23rd July 2025 Castle Borough Council approved the Castle Point Plan, Sustainability Appraisal, Habitats Regulations Assessment and the Equality Impact Assessment to proceed to a Regulation 19 public consultation.

The purpose of this notification is to advise you that the Council is seeking the views on the Castle Point Plan Regulation 19 Draft.

What is the Local Plan?

A Local Plan (The Castle Point Plan) is a long term plan which sets out a positive vision for the area and identifies where and how development should take place in the future. Having a Local Plan helps to ensure that the entire area is considered and that the delivery of development accords with the needs of that area. There is a requirement by Government for Local Plans to be kept up to date.

What is the Castle Point Plan?

The Castle Point Plan is a 17 year plan covering the period 2026 to 2043 that will include:

- Identifying where development should be located including housing, infrastructure and commercial
- Policies to safeguard the environment and enable climate change mitigation
- Policies to secure high quality design
- Specify requirements on housing need within the Borough

What information is available to inform responses?

The Castle Point Plan Regulation 19 Draft is available on the Council's website along with a corresponding Policies Map, Sustainability Appraisal, Habitats Regulations and Equality Impact Assessment. The technical evidence that supports the Plan and any relevant information to help inform your response is also available to view online. This can all be found here: <https://www.castlepoint.gov.uk/castle-point-plan>

How can comments be made?

Comments can be made using the online portal:

<https://consultation.castlepoint.gov.uk/cpplan/>

This contains the Castle Point Plan Regulation 19 Draft and comments should be targeted to specific sections of the document, for example a specific policy or paragraph number. Alternatively, comments can be made using the Castle Point Plan Regulation 19 Draft Consultation Response Booklet.

This can be returned to the Council by email to: CPPlan@castlepoint.gov.uk or by post to Castle Point Plan, Planning Department, Castle Point Borough Council, Kiln Road, Thundersley, Benfleet, Essex SS7 1TF.

The Castle Point Plan Regulation 19 Consultation Response Booklet is available on the Council website, the Council Offices, Waterside Leisure Centre and all local libraries.

Comments should be made on whether the Castle Point Plan as a whole or in part is legally compliant and meets the test of soundness. Details of what these mean and how to complete the form can be found on the online portal and within the Response Booklet.

What if a consultee doesn't have access to a computer?

Copies of the Castle Point Plan, Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment, including Response Booklets, can be found at Hadleigh, Great Tarpots, South Benfleet and Canvey Island libraries, Waterside Leisure Centre and the Council Offices at Kiln Road, Thundersley.

Comments must be submitted no later than 23:59 pm on Friday 26th September 2025.

What happens next?

At the end of the consultation period, all moderated comments will be published. The Council will then submit the Castle Point Plan, supporting documents and evidence and all comments received to this consultation to the Secretary of State, who pass them to a Planning Inspector for independent examination.

Having received your submitted comments for this consultation, we are also required to notify you when the independent examination will take place. We will use the contact details you have provided to do this. Your name and your comments will be published, but other personal information will remain confidential. You may be invited to discuss your comments at the oral examination if you have expressed a wish to do so.

If you chose not to provide your data for this purpose, or ask us to erase your data, you will be unable to participate further in the Castle Point Plan process.

If you would like to find out more about how the Council use your personal data, please contact us or go to <https://www.castlepoint.gov.uk/privacy-notices>

Thank you for taking the time to read this notice of consultation. Your comments are welcomed.

Yours Sincerely,

Amanda Parrott

Assistant Director, Climate and Growth

Appendix 6 – Consultation Response Book



Castle Point Together
Your community your views



Official use only:

Reference:

Date received:

CASTLE POINT PLAN REGULATION 19 DRAFT RESPONSE BOOKLET

CONSULTATION

This booklet is provided for you to make comments to the Castle Point Plan Regulation 19 Draft document. At this stage of the consultation, Castle Point Borough Council (CPBC) is seeking views on whether the Draft document is '**legally compliant**' (see summary below) and meets the tests of '**soundness**' (see summary below), as set out in the Government updated National Planning Policy Framework (NPPF) 2024.

Legal Compliance

- The Castle Point Plan should have been prepared in accordance with the Council's latest **Local Development Scheme**.
- The Castle Point Plan should be accompanied by a **Sustainability Appraisal and Habitat Regulations Assessment**.
- Consultation on the Castle Point Plan should have been carried out in accordance with the Council's **Statement of Community Involvement**.
- The Council should have worked collaboratively with neighboring authorities and prescribed bodies on strategic and cross boundary matters, known as the **Duty to Cooperate**.
- The Castle Point Plan should comply with **all relevant laws** including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

Soundness

- **Positively prepared** - provides 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 neighboring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- **Justified** - an appropriate strategy, considering the reasonable alternatives, and based on proportionate evidence.
- **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.
- **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies including the National Planning Policy Framework.

When submitting this Response Booklet, please bear in mind:

- You confirm your agreement to the publication of your name and your comments.
- Responses will be moderated and any comments which do not meet Castle Point Borough Council's Acceptable Use Policy will be deemed inadmissible and not accepted (If in doubt please contact us for clarification).
- A group sharing a common view on the Castle Point Plan Regulation 19 Draft or any other supporting document can submit a single comment. If this is the case, please indicate how many people the comment represents, the name of the group (if any) and how the comment has been agreed.
- You should answer all relevant questions to help ensure your response is validated.

To assist you, a copy of the **Castle Point Plan Regulation 19 Draft** and Habitats Regulations Assessment, Sustainability Appraisal and Equality Impact Assessment is available for your reference at CPBC, Waterside Leisure Centre and the four Castle Point Libraries. These documents and the **National Planning Policy Framework 2024** are also included in the online survey at www.castlepoint.gov.uk/castle-point-plan or if using your mobile phone to scan the QR Code →→



Responses must be received by CPBC no later than **23:59 pm Friday 26th September 2025**.

Part A – Contact Details

You must provide your contact details. We are unable to accept anonymous comments. The names of respondents and their submitted comments will be published on the Castle Point Borough Council website. Personal information such as telephone numbers, addresses, and email addresses will not be published.

Please tick as appropriate:

- I am responding as an individual (complete section 1 only)
- I am an Agent responding on behalf of a client (complete both sections 1 and 2)
- I am responding on behalf of an organisation (complete section 1 only)

1. Individual/Client/Organisation Details (Please complete in block capitals)		2. Agent Details (Please complete in block capitals)	
Title:		Title:	
First name:		First name:	
Last name:		Last name:	
Job Title/Dept:		Job Title/Dept:	
Organisation:		Organisation:	
Address:		Address:	
Post Code:		Post Code:	
Tel.no (Day):		Tel.no (Day):	
Email:		Email:	

Part B – Your Comments

You will need to complete the questions in each Comment section for each different part of the Castle Point Plan Regulation 19 Draft you wish to comment on. Should you wish to make more comments than the comment sections provided, please use an additional Booklet. Please do not include any personal information within your Comments as the responses in this section will be made publicly available as part of this consultation in reports and online.

Comment 1

1. Which part of the Castle Point Plan Regulation 19 Draft does this relate? (Please identify this by completing the following applicable questions):

Policy reference/name:	
------------------------	--

Page number:	
Paragraph Number:	
Site number/name:	
Objective number/name:	
Appendix reference/name:	
Table/Diagram reference number:	
Image/map reference number:	

2a. Do you consider the Caste Point Plan Regulation 19 Draft to be legally compliant?

Yes No

2b. If you responded no, please explain below (See 'Legal Guidance' on Page 1)

(Continue on a separate sheet if necessary)

3a. Do you consider the Castle Point Plan Regulation 19 Draft to be sound?

Yes No

3b. If you consider the Castle Point Plan Regulation 19 Draft not to be sound, please select which test(s) of soundness this relates to? (See 'Soundness' on Page 1)

<input type="checkbox"/> Positively prepared	<input type="checkbox"/> Justified
<input type="checkbox"/> Effective	<input type="checkbox"/> Consistent with national policy

3c. Please provide an explanation below.

(Continue on a separate sheet if necessary)

=

4. Please set out the modification(s) you consider necessary to make the Castle Point Plan Regulation 19 Draft 'legally compliant' and/or 'sound', including any revised wording.

(Continue on a separate sheet if necessary)

5. If your comment is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination.
- Yes, I wish to participate at the oral examination.

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Comment 2

- 1. Which part of the Castle Point Plan Regulation 19 Draft does this relate? (Please identify this by completing the following applicable questions):**

Policy reference/name:	
Page number:	
Paragraph Number:	
Site number/name:	
Objective number/name:	
Appendix reference/name:	
Table/Diagram reference number:	
Image/map reference number:	

2a. Do you consider the Castle Point Plan Regulation 19 Draft to be legally compliant?

Yes No

2b. If you responded no, please explain below (See 'Legal Guidance' on Page 1)

(Continue on a separate sheet if necessary)

3a. Do you consider the Castle Point Plan Regulation 19 Draft to be sound?

Yes No

3b. If you consider the Castle Point Plan Regulation 19 Draft not to be sound, please select which test(s) of soundness this relates to? (See 'Soundness' on Page 1)

<input type="checkbox"/> Positively prepared	<input type="checkbox"/> Justified
<input type="checkbox"/> Effective	<input type="checkbox"/> Consistent with national policy

3c. Please provide an explanation below.

(Continue on a separate sheet if necessary)

4. Please set out the modification(s) you consider necessary to make the Castle Point Plan Regulation 19 Draft 'legally compliant' and/or 'sound', including any revised wording.

(Continue on a separate sheet if necessary)

5. If your comment is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination.
- Yes, I wish to participate at the oral examination.

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Comment 3

1. Which part of the Castle Point Plan Regulation 19 Draft does this relate? (Please identify this by completing the following applicable questions):

Policy reference/name:	
Page number:	
Paragraph Number:	
Site number/name:	
Objective number/name:	
Appendix reference/name:	
Table/Diagram reference number:	
Image/map reference number:	

2a. Do you consider the Castle Point Plan Regulation 19 Draft to be legally compliant?

Yes No

2b. If you responded no, please explain below (See 'Legal Guidance' on Page 1)

(Continue on a separate sheet if necessary)

3a. Do you consider the Castle Point Plan Regulation 19 Draft to be sound?

Yes No

3b. If you consider the Castle Point Plan Regulation 19 Draft not to be sound, please select which test(s) of soundness this relates to? (See 'Soundness' on Page 1)

<input type="checkbox"/> Positively prepared	<input type="checkbox"/> Justified
<input type="checkbox"/> Effective	<input type="checkbox"/> Consistent with national policy

3c. Please provide an explanation below.

(Continue on a separate sheet if necessary)

4. Please set out the modification(s) you consider necessary to make the Castle Point Plan Regulation 19 Draft 'legally compliant' and/or 'sound', including any revised wording.

(Continue on a separate sheet if necessary)

5. If your comment is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination.
- Yes, I wish to participate at the oral examination.

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Comment 4

1. Which part of the Castle Point Plan Regulation 19 Draft does this relate? (Please identify this by completing the following applicable questions):

Policy reference/name:	
Page number:	
Paragraph Number:	
Site number/name:	
Objective number/name:	
Appendix reference/name:	
Table/Diagram reference number:	
Image/map reference number:	

2a. Do you consider the Castle Point Plan Regulation 19 Draft to be legally compliant?

Yes No

2b. If you responded no, please explain below (See 'Legal Guidance' on Page 1)

(Continue on a separate sheet if necessary)

3a. Do you consider the Castle Point Plan Regulation 19 Draft to be sound?

Yes No

3b. If you consider the Castle Point Plan Regulation 19 Draft not to be sound, please select which test(s) of soundness this relates to? (See 'Soundness' on Page 1)

<input type="checkbox"/> Positively prepared	<input type="checkbox"/> Justified
<input type="checkbox"/> Effective	<input type="checkbox"/> Consistent with national policy

3c. Please provide an explanation below.

(Continue on a separate sheet if necessary)

4. Please set out the modification(s) you consider necessary to make the Castle Point Plan Regulation 19 Draft 'legally compliant' and/or 'sound', including any revised wording.

(Continue on a separate sheet if necessary)

5. If your comment is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination.
- Yes, I wish to participate at the oral examination.

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Comment 5

1. Which part of the Castle Point Plan Regulation 19 Draft does this relate? (Please identify this by completing the following applicable questions):

Policy reference/name:	
Page number:	
Paragraph Number:	
Site number/name:	
Objective number/name:	
Appendix reference/name:	
Table/Diagram reference number:	
Image/map reference number:	

2a. Do you consider the Castle Point Plan Regulation 19 Draft to be legally compliant?

Yes No

2b. If you responded no, please explain below (See 'Legal Guidance' on Page 1)

(Continue on a separate sheet if necessary)

3a. Do you consider the Castle Point Plan Regulation 19 Draft to be sound?

Yes No

3b. If you consider the Castle Point Plan Regulation 19 Draft not to be sound, please select which test(s) of soundness this relates to? (See 'Soundness' on Page 1)

<input type="checkbox"/> Positively prepared	<input type="checkbox"/> Justified
<input type="checkbox"/> Effective	<input type="checkbox"/> Consistent with national policy

3c. Please provide an explanation below.

(Continue on a separate sheet if necessary)

4. Please set out the modification(s) you consider necessary to make the Castle Point Plan Regulation 19 Draft 'legally compliant' and/or 'sound', including any revised wording.

(Continue on a separate sheet if necessary)

5. If your comment is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination.
- Yes, I wish to participate at the oral examination.

(Continue on a separate sheet if necessary)

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Part C – Other Monitoring Information

We are asking for the following information so that we can ensure that the consultation has been accessible to everyone. We are required to do this by the Equality Act 2010. However, this is optional, and any personal data provided will not be published alongside your response.

1. What best describes your gender?

Male Female
 Transgender Prefer not to say.

Prefer to self-describe:

2. What age group do you belong to?

Under 16 years 16-24 years 25-34 years
 35-44 years 45-54 years 55-64 years
 65-74 years 75+ years Prefer not to say.

3. Do you consider yourself to be a disabled person?

Yes No Prefer not to say.

4. What is your sexual orientation?

Bi-sexual Heterosexual Gay Lesbian
 Prefer not to say.

5. What is your religion?

None Christianity Judaism Islam
 Buddhism Sikhism Hinduism Other

Prefer not to say.

If other, please state:

6. What is your ethnicity?

<input type="checkbox"/> White British	<input type="checkbox"/> White Irish
<input type="checkbox"/> Gypsy or Traveler	<input type="checkbox"/> Travelling Show person.
<input type="checkbox"/> Any other White background	<input type="checkbox"/> Asian or Asian British: Bangladeshi
<input type="checkbox"/> Asian or Asian British: Chinese	<input type="checkbox"/> Asian or Asian British: Pakistani
<input type="checkbox"/> Any other Asian or Asian British background	<input type="checkbox"/> Black or Black British: African
<input type="checkbox"/> Black or Black British: Caribbean	<input type="checkbox"/> Any other Black or Black British background
<input type="checkbox"/> Mixed: White and Black African	<input type="checkbox"/> Mixed: White and Black Caribbean
<input type="checkbox"/> Mixed: White and Asian	<input type="checkbox"/> Any other background
<input type="checkbox"/> Prefer not to say.	

If other, please state:

Part D – Future Notifications and Privacy Notice

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Castle Point Plan by ticking the relevant box(es):

- Submission of the Castle Point Plan to the Secretary of State for independent examination.
- Publication of the recommendations of the Planning Inspector appointed by the Secretary of State to carry out the independent examination.
- Adoption of the Castle Point Plan by the Council.
- Future revisions to the Castle Point Plan, new planning policies and guidance.

How we will use your information

We will use your details to contact you regarding your comments on the Castle Point Plan Regulation 19 Draft consultation.

Having received your submitted comments for this consultation, we are also required under The Town and Country Planning (Local Planning) (England) Regulations 2012, to notify you of when

the independent examination will take place. We will use the contact details you have provided to do this.

Please note: At the end of the consultation period, all moderated comments will be published and will be submitted to the Secretary of State, **who will pass them to a Planning Inspector**, along with the Castle Point Plan and other relevant supporting documents. Your name and your comments will be published, but other personal information will remain confidential.

Your comments will be reviewed by the independent Planning Inspector appointed by the Secretary of State to carry out the independent examination for the Castle Point Plan. You may be invited to discuss your comments at the oral examination if you have expressed a wish to do so.

If you chose not to provide your data for this purpose, or ask us to erase your data, you will be unable to participate further at this stage of the Castle Point Plan process.

If you would like to find out more about how the Council use your personal data, please contact us or go to <https://www.castlepoint.gov.uk/privacy-notices>.

Signature:

Date:

Please return this booklet to CPBC no later than **23:59pm on Friday 26th September 2025**

By Email: CPPPlan@castlepoint.gov.uk

By Post: Castle Point Plan Consultation, Planning Department, Castle Point Borough Council, Kiln Road, Thundersley, Benfleet, Essex, SS7 1TF

Appendix 7 – Local Plan Statutory Notice

PUBLIC
NOTICE **CASTLE**
POINT PLAN 2023-
2043 **STATEMENT OF**
REPRESENTATIONS PROCEDURE
Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning)
(England) **Regulations 2012 (Part 6, Regulation 19)**

Castle Point Borough Council ("the Council") formally approved the Castle Point Plan 2023-2043 ("the Local Plan") for publication on the 26th March 2025. In accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, the Castle Point Plan and its supporting documents will be published for public consultation.

The Castle Point Plan sets out the vision and framework for guiding development within the Castle Point Borough up to 2043. Based on technical evidence, the Castle Point Plan assesses what provision of homes, jobs, infrastructure, services, and facilities are required over the life of the Plan and identifies how they should be delivered.

The Castle Point Plan contains policies that the Council will use to determine planning applications.

Consultation on the Castle Point Plan and its supporting documents will begin on **Friday 1st August 2025** and end on **Friday 26th September**. All representations must be received by the Council no later than **23:59pm on Friday 26th September 2025**. During this time, any person or organisation may make representations.

All Castle Point Plan consultation and evidence base documents are available online via <https://www.castlepoint.gov.uk/castle-point-plan> for reference only at:

Castle Point Borough Council: Kiln Road, Thundersley, Essex, SS7 1TF

Monday to Thursday 08:45 – 17:15, Friday 08:45 – 16:45.

Waterside Leisure Centre: Somnes Avenue, Canvey Island SS8 9RA

Monday to Thursday: 6:00am – 10:00pm, Friday: 6:00am – 8:00pm,
Saturday: 8:00am – 5:45pm, Sunday: 8:00am – 8:00pm

Canvey Library: 3 High Street, Canvey Island, Essex, SS8 7RB

Monday to Saturday 09:00 – 17:00

Great Tarpots Library: 127 London Road, Benfleet, Essex, SS7 5UH

Monday, Tuesday, Thursday and Saturday 09:00 – 17:30

Hadleigh Library: 180 London Road, Hadleigh, South Benfleet, Essex, SS7 2PD

Monday, Tuesday, Thursday, Friday and Saturday 09:00- 17:30

South Benfleet Library: 264 High Road, South Benfleet, Essex, SS7 5HD

Tuesday, Wednesday, Friday and Saturday 09:00 – 17:30

Representations may be made electronically or in writing. Anyone wishing to make representations electronically should complete the online survey the link of which can be found on the Castle Point Borough Council website by selecting Castle Point Plan. Representations in writing can be made by completing a Response Booklet.

Response Booklets may be collected from any of the above locations or requested in writing by letter to Castle Point Borough Council (Castle Point Plan) Kiln Road, Thundersley, Essex, SS7 1TF or via the email address cpplan@castlepoint.gov.uk

Response booklets can be submitted by email to cpplan@castlepoint.gov.uk or by post to:

The Castle Point Plan, Castle Point Borough Council, Kiln Road, Thundersley, Essex, SS7 1TF.

Response Booklets will also be available during the following community 'drop-in sessions' the Council will be conducting around the Borough during the consultation period. This will give you the opportunity to attend and seek clarity on this process and obtain any information that may help you make representations.

Runnymede Hall, Thundersley – 11th August between 7pm and 8:30pm

The Paddocks, Canvey Island – 20th August between 7pm and 8:30pm

St Nicholas Church Hall, Canvey Island – 22nd August between 2pm and 3:30pm

Hadleigh Old Fire Station, Hadleigh – 28th August between 7pm and 8:30pm

Richmond Hall, South Benfleet – 3rd September between 2pm and 3:30pm

The Paddocks, Canvey Island - 18th September between 7pm and 8:30pm

Hadleigh Old Fire Station, Hadleigh - 24th September between 2pm and 3:30pm

The Paddocks, Canvey Island – 25th September between 2pm and 3:30pm

Representations should focus on whether the Local Plan is legally compliant and whether it is considered to meet the Tests of Soundness, as specified in the National Planning Policy Framework 2024. Those making a representation should also state whether they would like to speak at the independent examination.

For any further information about the Castle Point Plan or the consultation process, please email cpplan@castlepoint.gov.uk

Appendix 8 – Social Media Posts



Castle Point Borough Council

1,640 followers

2mo •

...

More engagement events for the Castle Point Plan are taking place this week across the Borough – stop by and have a chat with our team at any point in the [...more](#)



has been approved for public consultation
from 1 August to 26 September 2025

Engagement session

18 Sept 7pm-8:30pm

The Paddocks Community Centre

Your views matter!



Castle Point Borough Council

26 Sep •

...

Today is the final day to comment on the Castle Point Plan. Make sure you've had your say!... [See more](#)



has been approved for public consultation
from 1 August to 26 September 2025

So now your
views matter!

We urge residents to take part
and share their views [here now](#)



304



Posts

About

Photos

Reels

More ▾



CASTLE POINT BOROUGH COUNCIL

23 Sep ·

Tomorrow and Thursday, we'll be running two final engagement sessions for the Castle Point... [See more](#)



THE CASTLE POINT PLAN



has been approved for public consultation
from 1 August to 26 September 2025

Engagement session

24 Sept 2-3:30pm

Hadleigh Old Fire Station

Your views matter!



THE CASTLE POINT PLAN



has been approved for public consultation
from 1 August to 26 September 2025

Engagement session

25 Sept 2-3:30pm

The Paddocks Community Centre

Your views matter!



3



5



Castle Point Borough Council

23 Sep ·

...

Castle Point Borough Council is calling on residents to share their views on the draft Castle Point... [See more](#)

THE CASTLE POINT PLAN



Castle Point



Posts

About

Photos

Reels

More ▾

new policy called 'grey belt'"?

"Has the Council allocated housing on grey belt land?"

The Castle Point Plan 2026-2043



6



7



Castle Point Borough Council

...

16 Sep ·

"What happens if we don't develop a Local... [See more](#)



"What happens if we don't develop a local plan?"

The Castle Point Plan 2026-2043



3



4



Castle Point Borough Council

...

16 Sep ·

Tonight's meetings of Special Council and Cabinet will [be streamed live from our YouTube channel](#)... [See more](#)

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Appendix 9 – Re-consultation Castle Point Borough Council Website Landing Page

Skip to content Site map

Castle Point BOROUGH COUNCIL

Enter keywords

Castle Point Plan Consultation

We've set out a bold, community-led strategy for sustainable growth across the Borough. The Castle Point Plan will set out where new development will be allocated, how much affordable housing will be built and more up to 2043.

A further consultation is now open. [Please give us your views](#)

Supporting our residents

Apply for it

Pay for it

Report it

Check your bin date

Consultations

Have your say on the Castle Point Plan

What is the Castle Point Plan?

A priority for the Council is creating a bright and prosperous future for Castle Point. Key to this is planning how our borough will develop in the coming decades. We must ensure we have the right housing, infrastructure, green spaces and services to meet residents needs as we change and grow. To this end, we are developing the Castle Point Plan.

When complete, the Castle Point Plan will act as a framework to inform planning decisions and guide development in the borough over the next 20 years.



Appendix 10 – Re-Consultation Citizen Space Landing Page

Castle Point Plan Regulation 19 Further Consultation

Overview



Closes 5 Dec 2025

Opened 24 Oct 2025

Contact

Planning Policy

CPPlan@castlepoint.gov.uk

The Regulation 19 Further Consultation

Castle Point Borough Council formally approved the Castle Point Plan 2026-2043 ("the Local Plan") for publication on the 23 July 2025. In accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, the Castle Point Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, have been published for public consultation.

The Local Plan sets out the vision and framework for guiding development within the Castle Point Borough up to 2043. Based on technical evidence, the Local Plan assesses what provision of homes, jobs, infrastructure, services, and facilities are required over the life of the Plan and identifies how they should be delivered. The Local Plan is a statutory document that contains policies that the Council will use to determine planning applications.

Appendix 11 – Re-consultation Engagement Events

Date	Time	Venue
6 August	Evening – 7pm to 8:30pm	St. George's Church Hall (Benfleet)
7 August	Evening – 7pm to 8:30pm	Richmond Hall (Benfleet)
9 August	Evening – 7pm to 8:30pm	Daws Heath Social Hall
13 August	Afternoon – 2pm to 3:30pm	Council Offices (Thundersley)
14 August	Evening – 7pm to 8:30pm	Richmond Hall (Benfleet)
15 August	Afternoon – 2pm to 3:30pm	Council Offices (Thundersley)
16 August	Evening – 7pm to 8:30pm	St. Nicholas Church Hall (Canvey)
20 August	Afternoon – 2pm to 3:30pm	Runnymede Hall (Thundersley)
21 August	Afternoon – 2pm to 3:30pm	St. Nicholas Church Hall (Canvey)
22 August	Evening – 7pm to 8:30pm	Hadleigh Baptist Church Hall
3 September	Evening – 7pm to 8:30pm	Online
4 September	Evening – 7pm to 8:30pm	Runnymede Hall (Thundersley)
5 September	Afternoon – 2pm to 3:30pm	Daws Heath Social Hall
6 September	Afternoon – 2pm to 3:30pm	Online

Appendix 12 – Attendance to Re-consultation engagement Events

Consultation Event	Date	Number of Attendees
Canvey	5 th November 2025	1
Canvey	11 th November 2025	3
Thundersley	17 th November 2025	3
Thundersley	25 th November 2025	8

Appendix 13 – Email/Letter Notification of Re-Consultation

Letter Sent

Castle Point Plan Regulation 19 Consultation – further consultation 24 October to 5 December 2025

Castle Point Borough Council (the "Council") formally approved the Castle Point Plan 2026-2043 (the "Local Plan") for publication on the 23rd July 2025. In accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, the Local Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, have been published for public consultation.

The Local Plan sets out the vision and framework for guiding development within the Castle Point Borough up to 2043. Based on technical evidence, Local Plan assesses what provision of homes, jobs, infrastructure, services, and facilities are required over the life of the Local Plan and identifies how they should be delivered. It is a statutory document which contains policies that the Council will use to determine planning applications.

Consultation on the Local Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, took place from Friday 1 August 2025 until Friday 26 September 2025. Representations made during that period have been accepted as duly made, unless any respondent has individually notified otherwise.

As a consequence of a technology error, there was an earlier version of the Local Plan that appeared on the Council's website which could be construed as being subject to consultation. This earlier incomplete draft was, for a period, accessible within the online consultation form only.

To confirm, the correct version of the Local Plan was published in all other relevant places including on the Council's website landing page, council offices and libraries.

As a consequence of this technology error, the Council is undertaking further consultation on the Castle Point Plan to ensure that everyone has the opportunity to make representations on the correct version of the plan. If you made representations during the original consultation, you will receive a separate letter setting out how we are dealing with those representations.

The further consultation will take place from **Friday 24 October 2025** and end on **Friday 5 December 2025**. All representations must be received by the Council no later than **23:59 on Friday 5 December 2025**. During this time, any person or organisation may make representations.

All Castle Point Plan consultation and evidence base documents are available online via <https://www.castlepoint.gov.uk/castle-point-plan> and for reference only at:

Castle Point Borough Council: Kiln Road, Thundersley, Essex, SS7 1TF

Monday to Thursday 8:45am – 5:15pm, Friday 8:45am – 4:45pm

Waterside Leisure Centre: Somnes Avenue, Canvey Island SS8 9RA

Monday to Thursday: 6am – 10pm, Friday: 6am – 8pm,

Saturday: 8am – 5:45pm, Sunday: 8am – 8pm

Canvey Library: 3 High Street, Canvey Island, Essex, SS8 7RB

Monday to Saturday 9am – 5pm

Great Tarpots Library: 127 London Road, Benfleet, Essex, SS7 5UH

Monday, Tuesday, Thursday and Saturday 9am – 5:30pm

Hadleigh Library: 180 London Road, Hadleigh, South Benfleet, Essex, SS7 2PD

Monday, Tuesday, Thursday, Friday and Saturday 9am- 5:30pm

Please note, South Benfleet Library is currently closed for refurbishment and we are unable to provide materials in that location during this consultation.

Representations may be made electronically or in writing. Anyone wishing to make representations electronically should complete the online survey via the link of which can be found on the Castle Point Borough Council website by selecting Castle Point Plan. Representations in writing can be made by completing a Response Booklet.

Response Booklets may be collected from any of the above locations or requested in writing by letter to Castle Point Borough Council (Castle Point Plan) Kiln Road, Thundersley, Essex, SS7 1TF or via the email address cpplan@castlepoint.gov.uk

Response booklets can be submitted by email to cpplan@castlepoint.gov.uk or by post to:

The Castle Point Plan, Castle Point Borough Council, Kiln Road, Thundersley, Essex, SS7 1TF. Response Booklets will also be available during the following community drop in sessions the

Council will be conducting during the consultation period. This will give you the opportunity to attend and seek clarity on this process and obtain any information that may help you make representations.

The Paddocks, Canvey Island – 5 November 2025 between 2pm and 3:30pm

The Paddocks, Canvey Island – 11 November 2025 between 7pm and 8:30pm

Runnymede Hall, Thundersley – 17 November 2025 between 7pm and 8:30pm

Runnymede Hall, Thundersley – 25 November 2025 between 2pm and 3:30pm

Representations should focus on whether the Castle Point Plan is legally compliant and whether it is considered to meet the tests of soundness, as specified in the National Planning Policy Framework (NPPF). Those making a representation should also state whether they would like to speak at the independent examination.

For any further information about the Castle Point Plan or the consultation process, please email cpplan@castlepoint.gov.uk

Yours sincerely,



Amanda Parrott

Assistant Director, Climate and Growth

Email Sent

Castle Point Plan Regulation 19 Consultation – further consultation 24 October to 5 December 2025

Dear Stakeholder,

Castle Point Borough Council (the "Council") formally approved the Castle Point Plan 2026-2043 (the "Local Plan") for publication on the 23rd July 2025. In accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, the Local Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats

Regulations Assessment and Equality Impacts Assessment, have been published for public consultation.

The Local Plan sets out the vision and framework for guiding development within the Castle Point Borough up to 2043. Based on technical evidence, Local Plan assesses what provision of homes, jobs, infrastructure, services, and facilities are required over the life of the Local Plan and identifies how they should be delivered. It is a statutory document which contains policies that the Council will use to determine planning applications.

Consultation on the Local Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, took place from Friday 1 August 2025 until Friday 26 September 2025. Representations made during that period have been accepted as duly made, unless any respondent has individually notified otherwise.

As a consequence of a technology error, there was an earlier version of the Local Plan that appeared on the Council's website which could be construed as being subject to consultation. This earlier incomplete draft was, for a period, accessible within the online consultation form only.

To confirm, the correct version of the Local Plan was published in all other relevant places including on the Council's website landing page, council offices and libraries.

As a consequence of this technology error the Council is undertaking further consultation on the Castle Point Plan to ensure that everyone has the opportunity to make representations on the correct version of the plan. If you made representations during the original consultation, you will receive a separate email setting out how we are dealing with those representations. Please check your emails for this.

The re-consultation will take place from Friday 24 October 2025 and end on Friday 5 December 2025. All representations must be received by the Council no later than 23:59 on Friday 5 December 2025. During this time, any person or organisation may make representations.

All Castle Point Plan consultation and evidence base documents are available online via <https://www.castlepoint.gov.uk/castle-point-plan> and for reference only at:

Castle Point Borough Council: Kiln Road, Thundersley, Essex, SS7 1TF

Monday to Thursday 8:45am – 5:15pm, Friday 8:45am – 4:45pm

Waterside Leisure Centre: Somnes Avenue, Canvey Island SS8 9RA

Monday to Thursday: 6am – 10pm, Friday: 6am – 8pm,

Saturday: 8am – 5:45pm, Sunday: 8am – 8pm

Canvey Library: 3 High Street, Canvey Island, Essex, SS8 7RB

Monday to Saturday 9am – 5pm

Great Tarpots Library: 127 London Road, Benfleet, Essex, SS7 5UH

Monday, Tuesday, Thursday and Saturday 9am – 5:30pm

Hadleigh Library: 180 London Road, Hadleigh, South Benfleet, Essex, SS7 2PD

Monday, Tuesday, Thursday, Friday and Saturday 9am- 5:30pm

Please note, South Benfleet Library is currently closed for refurbishment and we are unable to provide materials in that location during this consultation.

Representations may be made electronically or in writing. Anyone wishing to make representations electronically should complete the online survey via the link of which can be found on the Castle Point Borough Council website by selecting Castle Point Plan.

Representations in writing can be made by completing a Response Booklet.

Response Booklets may be collected from any of the above locations or requested in writing by letter to Castle Point Borough Council (Castle Point Plan) Kiln Road, Thundersley, Essex, SS7 1TF or via the email address cpplan@castlepoint.gov.uk

Response booklets can be submitted by email to cpplan@castlepoint.gov.uk or by post to:

The Castle Point Plan, Castle Point Borough Council, Kiln Road, Thundersley, Essex, SS7 1TF.

Response Booklets will also be available during the following community drop in sessions the Council will be conducting during the consultation period. This will give you the opportunity to attend and seek clarity on this process and obtain any information that may help you make representations.

The Paddocks, Canvey Island – 5 November 2025 between 2pm and 3:30pm

The Paddocks, Canvey Island – 11 November 2025 between 7pm and 8:30pm

Runnymede Hall, Thundersley – 17 November 2025 between 7pm and 8:30pm

Runnymede Hall, Thundersley – 25 November 2025 between 2pm and 3:30pm

Representations should focus on whether the Castle Point Plan is legally compliant and whether it is considered to meet the tests of soundness, as specified in the National Planning Policy Framework (NPPF). Those making a representation should also state whether they would like to speak at the independent examination.

For any further information about the Castle Point Plan or the consultation process, please email cpplan@castlepoint.gov.uk

Yours sincerely,

Amanda Parrott

Assistant Director, Climate and Growth

Appendix 14 – Reminder Email/Letter of Re-consultation

Dear XXX

I am writing to you on behalf of Castle Point Borough Council (the “Council”) because you responded to the Castle Point Plan (“Local Plan”) statutory consultation which took place between the 1 August and 26 September 2025.

An email was previously sent to you on Friday 24 October 2025 regarding your representation to that consultation and required a further response to be provided. As of Thursday 6th November 2025, the Council have not received a response and are therefore contacting you again.

As a consequence of a technology error, there was an earlier version of the Local Plan that appeared on the Council’s website which could be construed as being subject to consultation. This earlier incomplete draft was, for a period, accessible within the online consultation form only.

To confirm, the correct version of the Local Plan was published in all other relevant places including on the Council’s website landing page, council offices and libraries.

As a consequence of this technology error the Council is undertaking further consultation on the Castle Point Plan to ensure that everyone has the opportunity to make representations on the correct version of the plan.

In order to ensure that the representations you submitted in respect of the original consultation were on the correct version of the plan, I would like to ask that you review your response against the version of the plan that can be found here: [Castle Point Plan](#)

I would be grateful if you could respond by reply email advising as to whether either:

1. The consultation response you submitted previously, and which is attached, was based on the correct version of the plan, and you do not wish to submit additional representations at this time;
2. The consultation response you submitted previously, and which is attached, was based on the correct version of the plan, but that you may wish to submit updated or additional representations; or
3. The consultation response you submitted previously, and which is attached, was based on the incorrect version of the plan, and you wish to submit an updated representation.

In the event that you wish to update your representation or make additional representations, the consultation closes on the 5 December 2025. All representations must be received by the Council no later than 23:59 on Friday 5 December 2025.

Representations should be made in writing and may be submitted in the following ways:

Representations may be made online by using the link at:
<https://www.castlepoint.gov.uk/castle-point-plan>

Representations may be submitted by email to: cpplan@castlepoint.gov.uk

Representations may be posted to: The Castle Point Plan, Castle Point Borough Council, Kiln Road, Thundersley, Essex, SS7 1TF.

Please remember, representations should focus on whether the Castle Point Plan is legally compliant and whether it is considered to meet the tests of soundness, as specified in the National Planning Policy Framework (NPPF). Those making a representation should also state whether they would like to speak at the independent examination.

If you have any queries about the re-consultation process you can email:
cpplan@castlepoint.gov.uk

Yours sincerely,

Amanda Parrott

Assistant Director of Climate and Growth

Place and Communities

Castle Point Borough Council

Tel: 01268 882200

Email: CPPPlan@castlepoint.gov.uk



Follow us on [Social Media](#)

Or online at www.castlepoint.gov.uk

Appendix 15 – Social Media Re-Consultation:

Castle Point Borough Council

Posts **About** **Photos** **Reels** **More ▾**


Four cc prop (Thur) Four cc prop (Roch) Three cc prop

42 **37** **26**

 **Castle Point Borough Council** · 24 Nov · 

The last engagement session for the Castle Point Plan consultation takes place tomorrow at Runnymede Hall from 2-3:30pm. Drop in at any time to speak to our team!

Upcoming engagement sessions

5 November 2pm - 3:30pm,
The Paddocks Community Centre,
Canvey Island

11 November 7pm - 8:30pm,
The Paddocks Community Centre,
Canvey Island

17 November 7pm - 8:30pm,
Runnymede Hall, Thundersley

25 November 2pm - 3:30pm,
Runnymede Hall, Thundersley

Your views matter!



2

 **Castle Point Borough Council** · 24 Nov · 

Our online system for viewing and commenting on planning applications was unexpectedly offline yesterday and this morning. This means documents



Posts

About

Photos

Reels

More ▾



Castle Point Borough Council

24 Oct ·

...

Due to a technical error during the previous consultation, we're running a further consultation on the Castle Point Plan from 24 October to 5 December 2025.

We're committed to fairness and transparency. If you submitted feedback before, you'll be contacted directly to review your comments. New participants are also welcome!

Drop-in sessions are available for support.

For full details, visit: [https://www.castlepoint.gov.uk/
news/castle-point-plan-further-consultation-
announcement-3455](https://www.castlepoint.gov.uk/news/castle-point-plan-further-consultation-announcement-3455)



Latest news

Castle Point Plan – further consultation announcement

Appendix 16 – Press Advert Reg 19

62 Echo

Friday August 1, 2025

www.echo-news.co.uk



Public Notice Portal

Planning Notices | Traffic Notices | Legal Notices | Probate Notices | Other Notices | Church and Religious Notices | Tenders and Contracts | Goods Vehicle Operator Licences

To advertise: 01206 508353

email: essex.public.notices@localiq.co.uk

Brought to you by Britain's Local News Media

GOODS Vehicle Licensing

PLANNING

Goods Vehicle Operator's Licence

Osmond Alder, trading as Goldcrest Oil Ltd, of Great Bridge, Tipton, West Midlands, DY4 7JT, is applying for a licence to use 35-37 Armstrong Road, Manor Trading Estate, Benfleet, Essex, SS7 4PW as an operating centre for 5 goods vehicles and 0 trailers.

Owners or occupiers of land (including buildings) near the operating centre(s), who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioners at Quarry House, Quarry Hill, Leeds, LS2 7UE, stating their reasons, within 21 days of this notice. Representers must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A Guide to Making Representations is available at www.gov.uk/government/publications/a-guide-to-making-representations-on-actions-and-complaints-good-vehicle-operator-licensing

PROBATE & TRUSTEE

JOSEPH PINTO Deceased
Pursuant to the In Testam Act 1956 anyone having a claim against or an interest in the Estate of the deceased, Joseph Pinto, 103 Avenue Apartments, Broadmead Avenue, Basildon, Essex, SS5 1NS who died on 06/05/2004, may send written particulars to the address below by 02/08/2025, after which date the Estate will be distributed. Being reported only to claimants and interested parties.

ParsonsKane Holmes
c/o Palmers Law Ltd,
19 Town Square, Basildon, SS14 8BD
Ref: SS/2025/103-04/05

ANTHONY RICHARD WILLIAMS Deceased
Pursuant to the In Testam Act 1956 anyone having a claim against or an interest in the Estate of the deceased, Anthony Richard Williams, 103 Avenue Apartments, Broadmead Avenue, Basildon, Essex, SS5 1NS who died on 18/10/2024, may apply to send written particulars to the Estate on or before 02/08/2025, after which date the Estate will be distributed. Having regard only to the debts and expenses of which they have had notice.
APG Legal & Aviation Ltd
Advocates, Solicitors, Notaries
Notary Public, Licensed Estate Agents
Print, Copy & Scan, Notary
Notary Public, Notary Public
Notary Public, Notary Public

STAY INFORMED ABOUT LICENSING PLANS FOR YOUR COMMUNITY.
Find out who is applying for an ALCOHOL LICENCE near you.
publicnoticeportal.uk

Public Notice Portal

PLANNING

CASTLE POINT BOROUGH COUNCIL

CASTLE POINT PLAN 2026-2043 STATEMENT OF REPRESENTATIONS PROCEDURE PLANNING AND COMPULSORY PURCHASE ACT 2004

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (PART 6, REGULATION 19)

Castle Point Borough Council ("the Council") formally approved the Castle Point Plan 2026-2043 ("the Local Plan") for publication on the 22nd July 2015, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Castle Point Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, will be published for public consultation.

The Castle Point Plan sets out the vision and framework for guiding development within the Castle Point Borough up to 2043. An application for planning permission will be made under the Local Plan and the Council will consider representations on the Local Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, will be made on Friday 01 August 2025 and on Friday 26th September 2025. All representations must be received by the Council no later than 22:00 on Friday 26th September 2025. During this time, any person or organisation may make representations.

All Castle Point Plan consultation and evidence base documents are available online at [https://www.castlepoint.gov.uk/castle-point-plan-and-for-information-only-at](http://www.castlepoint.gov.uk/castle-point-plan-and-for-information-only-at):

Castle Point Borough Council, Klin Road, Thundersley, Essex, SS7 1TT Monday to Thursday 08:45-17:15, Friday 08:45-16:45.

Wattonside Leisure Centre, Somers Avenue, Canvey Island SS8 8BW Monday to Thursday 6:00am-10:00pm, Friday 6:00am-8:00pm, Saturday 8:00am-5:45pm, Sunday 8:00am-8:00pm

Canvey Library, 3 High Street, Canvey Island, Essex, SS8 7RE Monday to Saturday 09:00-17:00

Great Teynby Library, 1271 London Road, Basildon, Essex, SS7 5BU Monday, Tuesday, Thursday and Saturday 09:00-17:30

Hoddesdon Library, 180 London Road, Hoddesdon, Essex, SS7 2TU Monday, Tuesday, Thursday, Friday and Saturday 09:00-17:00

South Benfleet Library, 254 High Road, South Benfleet, Essex, SS7 9JG Tuesday, Wednesday, Friday and Saturday 09:00-17:00

Representations may be made electronically or in writing. Anyone wishing to make representations electronically should complete the online survey via the link which can be found on the Castle Point Borough Council website by selecting Castle Point Plan. Representations in writing can be made by completing a Response Booklet.

Response Booklets may be collected from any of the above locations or requested in writing by letter to Castle Point Borough Council (Castle Point Plan) Klin Road, Thundersley, Essex, SS7 1TT or via the email address representations@castlepoint.gov.uk.

Response Booklets can be submitted by email to representations@castlepoint.gov.uk or by post to:

The Castle Point Plan, Castle Point Borough Council, Klin Road, Thundersley, Essex, SS7 1TT.

Response Booklets will also be available during the following community "information sessions". The Council will be conducting

around the Borough during the consultation period. This will give you the opportunity to attend and seek clarity on this process and obtain any information that may help you make representations.

Ramsgate Hall, Thundersley – 11th August 2025 between 7pm and 8:30pm

The Paddocks, Canvey Island – 20th August 2025 between 7pm and 8:30pm

St Nicholas Church Hall, Canvey Island – 22nd August 2025 between 2pm and 3:30pm

Hoddesdon Old Fire Station, Hoddesdon – 28th August 2025 between 7pm and 8:30pm

Richmond Hall, South Benfleet – 3rd September 2025 between 7pm and 8:30pm

The Paddocks, Canvey Island – 18th September 2025 between 7pm and 8:30pm

Hoddesdon Old Fire Station, Hoddesdon – 24th September 2025 between 7pm and 8:30pm

The Paddocks, Canvey Island – 25th September 2025 between 7pm and 8:30pm

Representations should focus on whether the Castle Point Plan is Legally Compliant and whether it is considered to meet the tests of Soundness, as specified in the National Planning Policy Framework (NPPF). Those making a representation should also state whether they would like to speak to the independent examination.

For any further information about the Castle Point Plan or the consultation process, please email representations@castlepoint.gov.uk

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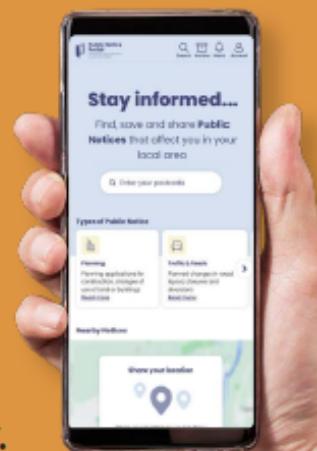
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PROBATE & Trustee

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JULIE TERESA EDWARDS (Deceased)

Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the above named, Mr of 118 Danesfort Drive, Leigh-on-Sea, Essex, SS9 4NH, who died on 02/05/2025, are required to send written particulars thereof to the Underfitter on or before 25/12/2025, after which date the Estate will be distributed having regard only to the claims and interests of which they have had notice.

Beecham Fisher Solicitors,
28 Chown Road,
Southend-on-Sea,
Essex, SS1 1AH

HARRY NORTON (Deceased)

Pursuant to the Trustee Act 1925 anyone with a claim against or an interest in the Estate of the deceased, late of 127 Ballards Walk, Basildon, Essex, SS15 5JR, who died on 24/01/2023, must send written details to the address below by 29/12/2025, after which the Estate will be distributed with regard only to claims and interests notified.

**LJ McClellan &
J R L Stirewalt, s/o**
Palmer's Law Limited,
19 Town Square,
Basildon, SS14 1BD.
Ref: VSK/115591/001

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Castle Point Borough Council PUBLIC NOTICE CASTLE POINT PLAN 2026-2043 STATEMENT OF REPRESENTATIONS PROCEDURE

Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England) Regulations 2012 (Part 6, Regulation 19)

RE-CONSULTATION 24 OCTOBER - 6 DECEMBER 2025

Castle Point Borough Council ("the Council") formally approved the Castle Point Plan 2026-2043 ("the Local Plan") for publication on the 23rd July 2025. In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Castle Point Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, have been published for public consultation.

The Local Plan sets out the vision and framework for guiding development in the area. The Plan, brought up to 2023, based on available evidence, the local Plan assesses what provision of homes, jobs, infrastructure, services, and facilities are required over the life of the Local Plan and identifies how they should be delivered. It is a statutory document which contains policies that the Council will use to determine planning applications.

Consultation on the Local Plan and its supporting documents including but not limited to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, took place from Friday 1 July 2023 until Friday 26 September 2023. Representations made during that period have been accepted as valid made by the Council.

As a consequence of a technology error related to the previous consultation, the Council is now re-consulting on the Local Plan.

This consultation will take place from Friday 24 October 2025 and end on Friday 5 December 2025. All representations must be received by the Council no later than 23:59 on Friday 5 December 2025. During this time, any person or organisation may make representations.

All Castle Point Plan consultation and evidence base documents are available online via <https://www.castlepoint.gov.uk/castlepoint-plan-and-references-only>:

Castle Point Borough Council, Kiln Road, Thundersley, Essex, SS7 1JF Monday to Thursday 08:45am - 5:15pm, Friday 08:45am - 4:45pm

Wendlebury Library Centre, Somers Avenue, Canvey Island SS8 8NA Monday to Thursday 6:00am - 10:00pm, Friday 6:00am - 8:00pm, Saturday 8:00am - 5:45pm, Sunday 8:00am - 8:00pm

Canvey Library, 31 High Street, Canvey Island, Essex, SS8 7JB Monday to Saturday 09:00am - 5:00pm

Great Tewkes Library, 127 London Road, Buntingford, Essex, SS7 8JU Monday, Tuesday, Thursday and Saturday 09:00am - 5:00pm

Hoddesdon Library, 180 London Road, Hoddesdon, Southgate, Essex, SS7 2JG Monday, Tuesday, Thursday, Friday and Saturday 09:00am - 5:00pm

Please note, Southgate Library is currently closed for refurbishment and we are unable to provide materials in that location during this consultation.

Representations may be made electronically or in writing. Anyone wishing to make representations electronically should complete the online survey via the link which can be found on the Castle Point Borough Council website by selecting Castle Point Plan. Representations in writing can be made by completing a Response Booklet.

Response Booklets may be collected from any of the above locations or requested in writing by letter to Castle Point Borough Council (Castle Point Plan), Kiln Road, Thundersley, Essex, SS7 1JF or via the email address coplan@castlepoint.gov.uk. Response booklets can be submitted by email to coplan@castlepoint.gov.uk or by post to:

The Castle Point Plan, Castle Point Borough Council, Kiln Road, Thundersley, Essex, SS7 1JF.

Response Booklets will also be available at the following community drop in sessions the Council will be conducting during the consultation period. This will give you the opportunity to attend and seek clarity on this process and obtain any information that may help you make representations.

The Paddocks, Canvey Island – 5 November 2025 between 2:00pm and 3:30pm

The Paddocks, Canvey Island – 11 November 2025 between 7:00pm and 8:30pm

Rammymeade Hall, Thundersley – 17 November 2025 between 7:00pm and 8:30pm

Rammymeade Hall, Thundersley – 25 November 2025 between 2:00pm and 3:30pm

Representations should focus on whether the Castle Point Plan is Legally Compliant and whether it is considered to meet the tests of Soundness, as specified in the National Planning Policy Framework (NPPF). These making a representation should also state whether they would like to speak at the independent examination.

For any further information about the Castle Point Plan or the consultation process, please email coplan@castlepoint.gov.uk

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