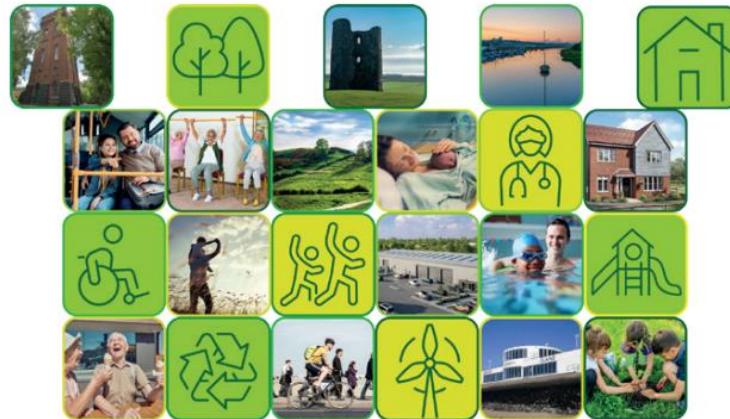


THE CASTLE POINT PLAN



Your community. Your views.

**Castle Point Plan Regulation 19 Draft
Initial Schedule of Proposed Modifications**

January 2026



This schedule contains proposed Modifications to the Castle Point Plan Regulation 19 Draft 2026 – 2043 which are considered necessary in order to make the Castle Point Plan sound or to correct factual errors, correct typos/grammar, formatting or styling.

This is a living document that will be updated throughout the progression of the Castle Point Plan from Regulation 19 to and through the Examination process. Please check the Council's website to ensure that you are viewing the most up to date version of this schedule.

Please note that the page numbers and paragraph numbering below refer to the Castle Point Plan as submitted - document dated July 2025.

The Modifications below are expressed in the form of ~~strikethrough~~ for deletions and **bold** for the additions of text.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M1	3	List of Policies	Hadleigh Town Centre	The chapter title refers to Hadleigh Town Centre when it should refer to the entire settlement of Hadleigh
M2	3	List of Policies	Castle Point's Spatial Strategy and Strategic Policies and Approach	The chapter title is not consistent with Contents (page 2) or main document (page 19)
M3	4	List of Policies	Ensuring the Vitality of Town Centres and Supporting Local Retail Services	The chapter title is not consistent with Contents (page 2) or main document (page 102)
M4	9	New paras to be inserted after para 2.7 ¹	Essex County Council is the Minerals Planning Authority for Castle Point Borough and is responsible for the preparation of the Minerals Local Plan 2014 (MLP), which is currently being reviewed. The MLP forms	As agreed with Essex County Council in SoCG

¹ Please note renumbering of this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>part of the Statutory Development Plan for the borough and should be read alongside the Castle Point Plan. Essex County Council must be consulted on all non-mineral related development proposed within a Minerals Safeguarding Area (MSA) that meet thresholds defined in the MLP. A Mineral Resource Assessment may need to be undertaken in advance of development. The MLP designates Mineral Consultation Areas (MCAs) at a distance of 250m around active quarries, mineral infrastructure and deposits and any development within these areas will require a Mineral Infrastructure Impact Assessment.</p> <p>Essex County Council is the Waste Planning Authority for Castle Point Borough, and the Essex and Southend-on-Sea Waste Local Plan (WLP) July 2017 forms part of the Statutory Development Plan for the borough and should be read alongside the Castle Point Plan. The WLP designates Waste Consultation Areas (WCAs) at a distance of 250m around permitted and allocated waste management facilities or within 400m of a Water Recycling Centre. A Waste Infrastructure</p>	

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			Impact Assessment will be required for any development within these thresholds to ensure there is no adverse impact on their existing or future operation.	
M5	11	Chapter 3	Castle Point in 2023 today	Reference to 2023 is no longer considered factually correct
M6	15	Strategic Position of Castle Point within South Essex diagram	Include Leigh Port as 'Port Facilities'.	As agreed with Southend-on-Sea Council in SoCG
M7	17	Vision	Natural assets are protected and nature recovery is prioritised. Green spaces in local areas will be pleasant places to rest and play and will be connected into the wider network of multi-functional green infrastructure, providing opportunities to connect with nature.	In response to Natural England comments and as agreed in SoCG
M8	18	Objective 18	Provide well designed homes that meet local needs in terms of quantity, affordability, care, support and accessibility and any accessibility requirements	As agreed with Essex County Council in SoCG
M9	18	Objective 19	Secure improved health and wellbeing outcomes for residents enabling more active and healthier lifestyles, creating healthy Living environments and reducing health inequalities ensuring inclusive communities	As agreed with Essex County Council in SoCG
M10	19	Chapter 6	Second paragraph is missing numbering, will affect numbering onwards throughout chapter	Typographical error

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M11	19	Policy SP1 – Supporting Enhancement of the Borough’s Green Spaces	<p>1.... Ensuring those areas identified as Strategic Combined Opportunity Areas are safeguardedprotected and enhanced to deliver the additional nature benefits identified to create new connections between habitat areas;</p> <p>2. Identifying new urban greening opportunities within and adjacent to the existing urban areas to deliver multi-functional green infrastructure that provides nature-based enhancements, habitat resilience and climate resilience</p>	As agreed with Essex County Council in SoCG
M12	19	Policy SP1 – Supporting Enhancement of the Borough’s Green Spaces	<p>4. Protecting the function of the Borough’s Green Belt and coastal areas by supporting opportunities to enable improved access, health and wellbeing and leisure infrastructure, for the overall enjoyment of residents, subject to sensitive consideration of environmental assets including internationally important coastal sites and ensuring they are not adversely impacted by recreational pressure.</p> <p>5. The management of any new and enhanced green infrastructure must be</p>	In response to Natural England comments and as agreed in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Green infrastructure delivered within (or associated with) major new developments should be managed, maintained and monitored for a minimum of 30 years in accordance with Natural England's GI Strategy Standard.	
M13	20	Para 6.5	It also has a key role to play in the overall quality of the environment in South Essex as evidenced by the Essex Local Nature Recovery Strategy , South Essex Green and Blue Infrastructure Strategy, Essex Green Infrastructure Strategy and Green Infrastructure Standards and the associated proposals for the SEE Park.	As agreed with Essex County Council in SoCG
M14	20	Para 6.9	This approach aligns with not just the NPPF but also meets legal requirement.	Typographical error
M15	21	Green Infrastructure Map	Colouring of map to be consistent with key Remove area of Ancient Woodland outside of the Castle Point Boundary (Kingley Wood) as this is within Rochford District. Remove school playing fields from open space designation	Consistency and clarity to enable the map to be fully understood, address comments from Port of London Authority (PLA) and factual correction as set out in the Rochford SoCG. As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M16	22	Policy SP2 – Making Efficient Use of Urban Land and Creating Sustainable Places	3d. Support integrated access to public open space, and the enhancement of the multi-functional green infrastructure network and biodiversity to offer a range of health, and environmental benefits;	In response to Natural England comments and as agreed in SoCG
M17	22	Policy SP2 – Making Efficient Use of Urban Land and Creating Sustainable Places	3b. Support the delivery of well-designed neighbourhoods, which enhance the local environment, enable urban greening, to create places where people want to live, work, and visit now and in the future	As agreed with Essex County Council in SoCG
M18	24	Para 6.30	As the density of the urban areas increases within the Borough, the need to protect and enhance access and existing environmental assets to make the best use of local open spaces and protect urban biodiversity becomes more acute. By opening up access to a wide range of facilities, residents and visitors will have an increased choice about when and how often they use local green assets.	In response to Natural England comments and as agreed in SoCG
M19	25	Policy SP3 – Meeting	Housing Supply at April 2023 2025	Factual correction for clarity and consistency.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		Development Needs Table	Thorney Bay (transitioning to Sandy Bay)	<p>As agreed with Essex County Council in SoCG</p> <p>The replacement of caravans to park homes has resulted in a change of site name. This would also be consistent with Policy C8 and Hou5.</p>
M20	26	Para 6.42	<p>In addition to this planned supply, consideration has been given to supply already in the pipeline. These are sites that have already been granted planning permission, known as existing commitments. This pipeline of supply forms the starting point for the housing growth that will happen over the Plan period. As of 1st April 2025, development totalling 480 new homes had the benefit of planning permission.</p> <p>The housing trajectory which supports the Castle Point Plan is set out in Appendix 2 of the Housing Topic Paper (August 2025).</p>	To provide clarity and a link to the evidence base which supports the Castle Point Plan.
M21	26	Para 6.43	<p>In the 2023/24 monitoring year, there was an overall loss of 58 homes in the Borough due to the removal of old-style caravans from Thorney Bay Park. Currently, old style caravans are being removed from Thorney Bay Park and replaced with new style park homes (now known as Sandy Bay). The replacement with new style park homes contribute to the housing pipeline supply. As the site is a caravan park,</p>	Factual correction for clarity and consistency. The replacement of caravans to park homes has resulted in a change of site name. This would also be consistent with Policy C8 and Hou5.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			the siting of the park homes does not need planning consent but does contribute to housing supply. Over the Plan period it is expected that a total of 173 park homes will replace existing caravans at Thorney Bay Park.	
M22	27	Para 6.47	A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage in order to and will need to demonstrate no adverse effects on site integrity before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M23	29	Strategic Policy SP4 – Development Contributions	Policy Title: Strategic Policy SP4 – Development Contributions	Typographical error
M24	29	Strategic Policy SP4 – Development Contributions ²	1. The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development. 2. Where necessary, the Council will seek developers to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms, in accordance with the tests set out in the National Planning Policy Framework	As agreed with Essex County Council in SoCG

² Please note renumbering of the clauses within Policy SP4 will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			(NPPF) and the provisions of the Community Infrastructure Levy Regulations and having regard to the provisions of the Infrastructure Delivery Plan. Proposals for any development must demonstrate that the required infrastructure to support the development will be delivered in a timely, and where appropriate, phased manner.	
M25	30	New para to be inserted after Para 6.66	6.67 As set out in policy ENV3, developments may also be required to satisfy the requirements of the Habitats Regulations by making contributions as defined in the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) or by the provision of sustainable accessible natural greenspace (SANG) or SANG-like provision.	Responding to RSPB comments
M26	33	Policy C1 - Canvey Town Centre	Regeneration and investment into Canvey Town Centre will be delivered via a new Canvey Town Centre Master Plan within the area identified as a broad location on the Policies Map, which will identify: The masterplan will develop the following principles:	Whilst policy D3 is clear that Master Plans should be approved in advance of planning applications, modifications are necessary to policies C1, C4, Had 1 and B8 to confirm that, in the event of premature proposals, the outlined principles do still apply in advance of masterplan approval.
M27	33	Policy C1 - Canvey Town Centre	11. The inclusion of appropriate SuDs to manage surface water flood risk in the town, to provide betterment for the	Agreed with Anglian Water in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			community via urban Opportunities for managing flood risk through greening, water capture schemes and the appropriate use of materials to enhance the public realm, health, wellbeing, biodiversity and air quality	
M28	33	Policy C1 - Canvey Town Centre	14. Development proposals must satisfy the requirements of the habitats regulations and must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	Change consequential to the amendments to Policy ENV3 agreed in the Natural England Statement of Common Ground and as agreed with Essex County Council in SoCG.
M29	34	Para 8.13 There will be a need for local access to open spaces as well as space for visitors. There is also an opportunity to provide landscaping, green space and nature improvements for the benefit of residents and wildlife useful guidance can be found in <u>Home - Nature Towns & Cities</u>. Where there are opportunities to provide flexible...	As agreed with Essex County Council in SoCG
M30	35	Canvey Town Centre Master Plan Area Map	Key to be updated to include allocations (currently shown in red on map)	Consistency and clarity to enable the map to be fully understood
M31	35	Para 8.16	A Habitats Regulations Assessment will be required at application stage in order to and	In response to Natural England comments and as agreed in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			will need to demonstrate no adverse effects on site integrity before development can be granted permission.	
M32	36	Para 8.17	... to the town centre from the north and east. Redevelopment of Canvey Town Centre also provides opportunities for landscaping and biodiversity improvements to this area to create attractive green spaces and planting for residents to enjoy.	As agreed with Essex County Council in SoCG
M33	36	Para 8.20	:The Paddocks site will be re-imagined as a lively community hub as part of a high quality mixed use development better connected to the town centre, which could support skills development of the local community.	As agreed with Essex County Council in SoCG
M34	37	Para 8.22	There is scope within this area to increase tourism activities, including access to Thorney Bay Pavillion , through some additional business growth in the leisure and food and drink offer, and through the utilisation of public spaces including the park, the bandstand, and the beach.	As agreed with Essex County Council in SoCG
M35	37	Para 8.25	The seafront sits behind the Canvey Island sea defences which are undergoing enhanced work to increase their protection and deal with the impact of rising sea levels. have recently benefitted from the Environment Agency's multi-million pound investment of central government funding to maintain the	In response to the Environment Agency's comments

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			defences' high level of tidal flood risk management work and deal with the impact of rising sea levels.	
M36	37	Para 8.26	Habitats Regulations Assessment will be required at application stage in order to and will need to demonstrate no adverse effects on site integrity before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M37	38	Policy C3 – Canvey Port Facilities	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 where appropriate;	Responding to comments from Oikos Ltd re: enhancements to access 'will' be sought. Taking a blanket approach to proposals is not considered to be justified or effective and contradicts paragraph 8.30
M38	38	Photograph	Change the photograph so it shows the Canvey facilities (Current one is an aerial image of a fuel refinery facility and not an image of either the Oikos facility or the Calor Gas facility)	To better reflect the local area and responding to comments from Oikos
M39	38	Para 8.27	There are two port facilities located adjacent to each other at south Canvey. These port facilities include the Calor Gas terminal located to the west of Thames Road for the importation and storage of liquefied petroleum gas and the Oikos terminal to the east of Haven Road, which receives and stores oil and a range of hydrocarbon products and various	Responding to Port of London Authority comments

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>sustainable fuel products. Both terminals have close good deep-water accessible jetties with good access to shipping lanes that are used to receive fuel imports by ship. These fuels are exported from the terminals by pipelines and by road tanker. The Calor Gas and Oikos terminals are nationally significant, well situated close to the mouth of the Thames estuary and gateway to the Port of London, and have a role to play in ensuring the security of energy supplies in the UK.</p>	
M40	39	Para 8.30	<p>The port facilities occupy a substantial frontage of the waterfront at South Canvey. This limits access to a narrow strip of the waterfront in this location, creating an enclosing effect for users. This route, which is part of the English Coast King Charles III England Path, is not bicycle or equestrian friendly.....</p>	Factual correction in response to Port of London Authority comments
M41	39	Para 8.32	<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 to 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, and the</p>	Response to Port of London Authority comments.

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			Port of London Authority's River Works Licencing process also forms a requirement as part of any works in, on or over the Tidal Thames.	
M42	40	Policy C4 – West Canvey	Land at West Canvey, as identified on the Policies Map as a broad location, will provide around 2,700 new homes, employment, associated community facilities and open space provision, of which 2,000 will be delivered by 2043. A master planned approach to the regeneration and renewal of west Canvey will be taken to optimise urban land use and improve the quality of the urban environment and public realm. The Master Plan will provide: The masterplan will develop the following principles:	Whilst policy D3 is clear that Master Plans should be approved in advance of planning applications, modifications are necessary to policies C1, C4, Had1 and B8 to confirm that, in the event of premature proposals, the outlined principles do still apply in advance of masterplan approval.
M43	40	Policy C4 – West Canvey	3. Improved public realm which prioritises pedestrian movements and creates spaces for community, civic and business activities. The public realm strategy should integrate urban greening and incorporate sustainable drainage into the approach to materials and landscaping. The inclusion of flood resilient design and opportunities to reduce the causes and impacts of flooding should also be considered where possible.	Response to Environment Agency's comments.
M44	40	Policy C4 – West Canvey	A new 72 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.22	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>0.13 hectares of suitable land and two new 56 place stand-alone early years and childcare nurseries (Use Class E(f)) each on 0.18 hectares of suitable land allocated for education and childcare use and additional primary school provision as required</p>	
M45	40	<p>Policy C4 – West Canvey. New criteria 10 and 11 to be inserted³.</p>	<p>9. Appropriate links into multi-functional green infrastructure to the west of the site whilst avoiding adverse harm to biodiversity through recreational impacts, or other impacts arising from urban development.</p> <p>9) Well-designed alternative SANG, to help alleviate pressure on the Essex Coast habitats;</p> <p>10) A strategy that minimises impacts upon the SSSI and does not impede LNRS aims of connectivity; via sensitive consideration of siting, buffers, lighting and noise. Residential development should be located with suitable buffers and in less sensitive parts of the site to avoid adverse impacts</p>	<p>Responding to comments from the RSPB and Natural England.</p>

³³ Please note renumbering of the clauses within Policy C4 will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			11) Enhancements that complement the designated features and features of interest of Canvey Wick SSSI. Redevelopment of the adjacent area should factor in features that will support increased biodiversity, in particular scarce and rare invertebrates, via measures such as green roofs, brownfield habitat, sandy planted areas/sandbanks and use of waste material such as crushed concrete in gabion baskets.	
M46	40	Policy C4 – West Canvey	10. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Combined Opportunityies Areas as well as protect Areas of Biodiversity Importance set out in the Essex Local Nature Recovery Strategy (LNRS).	As agreed with Essex County Council in SoCG
M47	40	Policy C4 – West Canvey. New criteria to be added after current criteria 6 ⁴	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.	Agreed with Anglian Water in SoCG
M48	41	Para 8.39 and new paragraph to be inserted	To ensure environmental quality, and to reduce the risks of adverse impacts from	Agreed with Anglian Water in SoCG and also a discrete element in response to Natural England

⁴ Please note renumbering of the clauses within Policy C4 will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			<p>surface water, hydraulic overloading and pollution, it is expected that the regeneration of west Canvey will include urban greening and the introduction of sustainable drainage. must be supported by a surface water drainage strategy. The Strategy will be fully informed by engagement with key partners including the Environment Agency, Water utilities companies and Essex County Council (as Lead Local Flood Authority) and will prioritise consideration of SuDS and urban greening.</p> <p>SuDS should be the principal but may not be the only method. SuDS are often most viable when considered early in the design process, so developers are encouraged to engage in pre-application discussions with Essex County Council (as Lead Local Flood Authority), and refer to ECC's SuDS Design Guide, and any future updates, when preparing applications incorporating SuDS schemes. These are critical to address the impacts of climate change in an urbanised environment and especially in a low-lying area such as Canvey. Furthermore, it is expected that the development will integrate with multi-functional</p>	<p>comments and provisionally agreed in SoCG (references to Canvey Wick SSSI). Last sentence added as a result of the Environment Agency's comments.</p>

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents, whilst ensuring that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development. Developers should engage with Anglian Water as early in the process as possible, if a connection to the public surface water sewerage system is proposed). Early engagement with the environment agency is also recommended to consider the challenges of overlapping timeframes will present between TE2100 aspirations for defence raising against proposed housing delivery.</p>	
M49	41	Para 8.40	<p>The nature conservation sites at west Canvey are however sensitive to recreational activities and urban development so it is important that the Master Plan deals with this in an appropriate manner. A Habitats Regulations Assessment will be required of the Master Plan and associated development proposals to avoid any and will need to demonstrate no adverse impacts on the integrity of nearby habitats sites or functionally linked land before development can be granted permission.</p>	<p>In response to Natural England comments and as agreed in SoCG</p>

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M50	42	Policy C5 – Improved Access to and around Canvey Island	2. This will be prepared in collaboration with key partners including ECC, adjoining district and unitary councils, Transport East, National Highways, Natural England, Environment Agency , Government departments such as the DfT, BEIS and MHCLG and relevant agencies as well as engagement with the local community.	Responding to comments from National Highways, Natural England and the RSPB
M51	42	Policy C5 – Improved Access to and around Canvey Island	4. Options in the feasibility study for improvements to access to Canvey Island must seek to minimise environmental impacts and will be subject to Habitats Regulations Assessment that will need to demonstrate to ensure there is no adverse effect on integrity to ensure there is no resulting harm to internationally protected sites.	Responding to comments from National Highways, Natural England and the RSPB
M52	43	Para 8.50	ECC as Highway and Transportation Authority will be required to be directly involved in the scoping and undertaking of any feasibility study. The Essex Resilience Forum (in their multi-Agency Emergency Planning role) should also be included in the scoping and undertaking of the feasibility study.	Responding to the Environment Agency's comments.
M53	45	Policy C6 – The South Canvey Green Lung	5. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	
M54	45	Para 8.56	Whilst most forms of development cannot take place in this area due to the constraints around the port facilities, this is an area where further enhancement of ecology through biodiversity net gain or through long term schemes such as Countryside Stewardship would be encouraged by the Council. The Green and Blue Infrastructure Strategy identifies a long-term opportunity to establish a Country Park at the Green Lung and through this, there may be the possibility to establish a well-designed dog-walking green space in the area.	Responding to comments from the RSPB
M55	48	Policy C8 – Residential Park Homes Sites, Canvey Island	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 can be found in Improving the Flood Performance of New Buildings and Building a Flood Resilient Future. All proposed development seeking planning permission should be accompanied by a flood emergency plan, demonstrating the steps that will be taken to manage flood risk.	In response to the Environment Agency's comments
M56	48	Policy C8 – Residential Park Homes Sites, Canvey Island	4.b. The overall quantum of residential development is retained, <u>or increased</u> ;	In response to the Environment Agency's comments

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M57	48	Policy C8 – Residential Park Homes Sites, Canvey Island	e. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	As agreed with Essex County Council in SoCG
M58	49	Policy C9 – Land at the Point, Canvey Island	i. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	As agreed with Essex County Council in SoCG
M59	50	Para 8.72A Habitats Regulations Assessment will be required of development proposals to avoid any and will need to demonstrate no adverse effects on the integrity of nearby Habitats sites including from construction impacts as well as occupational impacts, before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M60	52	Para 8.78	A Habitats Regulations Assessment will be required of development proposals at C10F: Ozonia Gardens and C10G: Land between Station Road and Seaview Road to avoid any and will need to demonstrate no adverse effect on the integrity of nearby Habitats sites or functionally linked land, before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M61	54	Para 9.9	<ul style="list-style-type: none"> • Improve cycle facilities at Benfleet Station 	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<ul style="list-style-type: none"> Create a mobility hub at Benfleet Station 	
M62	55	Policy B1 – South Benfleet Town Centre	<p>4. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p> <p>5. Opportunities for greening the town centre and providing biodiversity net gain at street level and above</p>	As agreed with Essex County Council in SoCG
M63	56	Policy B2 – Tarpots Town Centre	5. Opportunities for greening the town centre and providing biodiversity net gain at street level and above	As agreed with Essex County Council in SoCG
M64	58	Policy B4 – South Benfleet Leisure Quarter	<p>4. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p>	As agreed with Essex County Council in SoCG
M65	59	Policy B5 – Canvey Supply, London Road, Benfleet	<p>2. The proposal is compliant with all other relevant policies of this Plan'</p>	<p>Agreed in Anglian Water SoCG as unnecessary and inconsistent with other policies.</p> <p>NPPF paragraph 16 states that Plans should avoid unnecessary duplication</p>

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
				<p>of policies that apply to a particular area.</p> <p>Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole.</p>
M66	60	Policy B6 – 159-169 Church Road, Benfleet ⁵	<p>3. Main vehicular access to the site is secured from Roseberry Avenue only.; and</p> <p>4. The proposal is compliant with all other relevant policies of this Plan'</p>	<p>Agreed in Anglian Water SoCG as unnecessary and inconsistent with other policies.</p> <p>NPPF paragraph 16 states that Plans should avoid unnecessary duplication of policies that apply to a particular area.</p> <p>Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole.</p>
M67	60	Policy B6 – 159-169 Church Road, Benfleet. New criteria to be added	A Waste Infrastructure Impact Assessment is undertaken given the site is located within a Waste Consultation Area in relation to the waste site on Armstrong Road.	As agreed with Essex County Council in SoCG
M68	61	Policy B7 – Other Housing	Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the	As agreed with Essex County Council in SoCG

⁵ Please note renumbering of Policy B6 will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		Site Allocations in Benfleet	Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	
M69	61	Para 9.21	...Therefore, ground floor commercial provision is required to address the potential loss. The site is located within a Waste Consultation Area regarding the waste site at Armstrong Road. As a result, a Waste Infrastructure Impact Assessment should be undertaken	As agreed with Essex County Council in SoCG
M70	61	Para 9.23	A Habitats Regulations Assessment will be required of development proposals at B7A: Richmond Avenue Car Park to avoid any and will need to demonstrate no adverse effect on the integrity of nearby Habitats sites or functionally linked land, before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M71	62	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 for the area identified as a broad location on the Policies Map will deliver: The masterplan will develop the following principles:	Whilst policy D3 is clear that Master Plans should be approved in advance of planning applications, modifications are necessary to policies C1, C4, Had 1 and B8 to confirm that, in the event of premature proposals, the outlined principles do still apply in advance of masterplan approval.

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M72	62	Policy B8 – Manor Trading Estate	4. Improved public realm which creates space for pedestrians and cyclists to move around. The public realm strategy should integrate urban greening, biodiversity net gain and incorporate sustainable drainage into the approach to materials and landscaping	As agreed with Essex County Council in SoCG
M73	62	Policy B8 – Manor Trading Estate	8. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	As agreed with Essex County Council in SoCG
M74	63	Policy B8 - Manor Trading Estate Map	Remove 4 x bungalows in south west corner of site from the red line boundary	To correct mapping error and be consistent with Policies Map
M75	64	Policy B9 – South Benfleet Playing Fields	6. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	As agreed with Essex County Council in SoCG
M76	66	Para 10.2	Hadleigh Castle (a Scheduled Monument and Grade 1 listed) sits to the south of the town centre and dates to Saxon times. Whilst it is in a ruined state, it is the centrepiece of the Hadleigh Castle Country Park, a major tourist attraction within the Borough which was home to the 2012 Olympic Mountain Biking events.	Response to Historic England representations.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M77	66	Para 10.6	<p>Improved environmental conditions including urban greening within the town centre could can help to create an enhanced town centre offer, the attractiveness of the town centre including along with an improved evening and leisure offer. Useful guidance can be found in Home - Nature Towns & Cities. A banking hub is also desired to enable residents and local businesses to have access to shared banking services.</p>	As agreed with Essex County Council in SoCG
M78	67	Policy Had1 – Hadleigh Town Centre	<p>Regeneration and investment into Hadleigh Town Centre will be via a new Hadleigh Town Centre Master Plan within the area identified as a Broad Location on the Policies Map. which will identify: The masterplan will develop the following principles:</p>	Whilst policy D3 is clear that Master Plans should be approved in advance of planning applications, modifications are necessary to policies C1, C4, Had 1 and B8 to confirm that, in the event of premature proposals, the outlined principles do still apply in advance of masterplan approval.
M79	67	Policy Had1 - Hadleigh Town Centre	<p>6. A car parking strategy that provides the level of car parking required to meet foreseen demand and accessibility between commercial areas and car parking having regard to the EPOA Parking Guidance.</p>	As agreed with Essex County Council in SoCG
M80	67	Policy Had1 - Hadleigh Town Centre	<p>11. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p>	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M81	69	Policy Had1 - Hadleigh Town Centre Map	Key to be updated to include Site Allocations (currently shown in red on map)	Consistency and clarity to enable the map to be fully understood
M82	70	Policy Had2 – Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes	<p>1. Within the area as identified on the Policies Map, the Council will support the following land uses and proposals for development:</p> <p class="list-item-l1">a. 1. Proposals related to the improvement of recreational facilities within the Country Park and maintenance of the Country Park where they do not have a significant impact on Hadleigh Castle or its setting, the landscape, environmental assets or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan;</p> <p class="list-item-l1">b. 2. Proposals related to the development and/or use of the farm for agricultural and/or training purposes in line with the charitable mission of the landowner, where they do not have a significant impact on Hadleigh Castle or its setting, the landscape, environmental assets or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan;</p>	<p>1. Responding to Historic England comments, and</p> <p>2. Correcting contextual error in paragraph numbering/ordering so it makes grammatical sense in light of the opening paragraph wording</p> <p>3. As agreed with Essex County Council in SoCG</p>

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>setting, the landscape, environmental assets or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan; or</p> <p>c. 3. Proposals for habitat creation and habitat management and mitigation which are complementary to the habitats which already exist on or near the site, with specific regard to the Southend and Benfleet Marshes SPA and Ramsar site.</p> <p>2.4. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p> <p>3.5. Development proposals must ensure areas that are identified as an Area of Particular Importance for Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS) are protected and where possible enhanced.</p>	

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M83	70	Para 10.20	<p>The site is however visually prominent, and provides the setting for Hadleigh Castle, a Scheduled Monument. It is therefore critical that any development allowed should not have a significant does not impact on the landscape. Furthermore, it is important that any recreational or farming activities are compatible with the nature conservation status of the area.</p>	<p>Ensuring consistency between paragraph 10.20 and policy text (i.e. para 10.20 also recognises the importance of compatibility with the nature conservation status of the area)</p>
M84	72	Policy Had3 - Hadleigh Clinic	<p>3. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p>	<p>As agreed with Essex County Council in SoCG</p>
M85	73	Policy Had4 – Land South of Scrub Land ⁶	<p>4..... Hadleigh Infants and Nursery School; and</p> <p>5. The loss of playing field land is mitigated by an appropriate financial contribution towards new or enhanced playing field facilities nearby;.</p> <p>‘6. The proposal is compliant with all other relevant policies of this Plan’</p>	<p>Agreed in Anglian Water SoCG as unnecessary and inconsistent with other policies.</p> <p>NPPF paragraph 16 states that Plans should avoid unnecessary duplication of policies that apply to a particular area.</p>

⁶ Please note renumbering of Policy Had4 will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
				Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole.
M86	73	Policy Had4 – Land South of Scrub Land. New criteria to be added.	Provides opportunities for multifunctional green infrastructure and biodiversity net gain	As agreed with Essex County Council in SoCG
M87	73	Para 10.27	The site is approximately 1.5ha 1.15ha in size and is adjacent to the Hadleigh Infant School and is vacant, and surplus to education requirements.	Typographical error
M88	75	Policy Thun1 – Thundersley Centre. New criteria to be added.	4. Provides opportunities for greening the centre and biodiversity of net gain at street level and above.	As agreed with Essex County Council in SoCG
M89	76	Policy Thun2 – Kiln Road Campus	A new 56 place stand alone early years and childcare nursery on 0.13 hectares (Use Class E(f)) on 0.18 hectares of suitable land allocated for education use	As agreed with Essex County Council in SoCG
M90	76	Policy Thun2 – Kiln Road Campus	7. Development proposals should satisfy the requirements of the habitats regulations by providing sustainable accessible natural greenspace (SANG) or SANG-like provision in accordance with Policy ENV3. Development must also be designed to	Change consequential to the amendments to Policy ENV3 agreed in the Natural England Statement of Common Ground.

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	
M91	76	Policy Thun2 – Kiln Road Campus	<p>7. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within Strategic Opportunities set out the Essex Local Nature Recovery Strategy (LNRS) and</p> <p>8....(LNRS) are protected and where possible enhanced.;and</p> <p>9.the proposal is compliant with all other relevant policies of this Plan.</p>	<p>As agreed with Essex County Council in SoCG</p> <p>Agreed in Anglian Water SoCG as unnecessary and inconsistent with other policies.</p> <p>NPPF paragraph 16 states that Plans should avoid unnecessary duplication of policies that apply to a particular area.</p> <p>Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole.</p>
M92	76	Policy Thun2 – Kiln Road Campus. New criteria to be added	Proposals should demonstrate how SuDS will be incorporated into the master planning of the site in accordance with Policy SD3	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			Provide opportunities for greening the centre and biodiversity of net gain at street level and above	
M93	77	Para 11.17	A Habitats Regulations Assessment will be required at application stage in order to and will need to demonstrate no adverse effects on sites integrity, before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M94	82	Policy DH1– Green Space Connectivity in Daws Heath	2. The Council will continue to support opportunities for restoration, enhancement and creation of habitats in the area, particularly priority habitats and habitats benefiting protected/priority species including heath fritillary butterflies, badgers and southern wood ants.	Responding to RSPB comments
M95	82	Policy DH1 – Green Space Connectivity in Daws Heath	4. The area's recreational role will be protected and enhanced with opportunities for managed passive recreation, focusing on health, wellbeing and education value. Projects improving manged walking, and cycling and horse riding connections across the wider area will be supported.	In response to comments from the British Horse Society, to ensure the horse riding connections are also supported in Daws Heath and to correct typographical error.
M96	82	Policy DH1 – Green Space Connectivity in Daws Heath	6. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	
M97	85	Para 13.2	The Borough continues to have a range of housing needs, and these have been identified through a Local Housing Needs Assessment and the Supported and Specialist Housing Needs Assessment (May 2025) . The approach to meeting development needs is set out in Policy SP3, a minimum of 6,196 homes will be delivered across the plan area to 2043.	As agreed with Essex County Council in SoCG
M98	86	Policy Hou2 - Securing More Affordable Housing	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 the use of a late stage viability assessment linked to an overage clause within the S106 Agreement, in the event that viability improves prior to the completion of the development.	In response to comments from McCarthy Stone/Churchill Retirement Living
M99	88	Policy Hou3 - Housing Mix	Additional sentence 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	In response to comments from McCarthy Stone/Churchill Retirement Living

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			on a case by case basis in line with identified housing need	
M100	90	Policy Hou4 – Specialist Housing Requirements	2a. Proposals that contribute towards the delivery of 1,056 retirement/ sheltered homes and 594 extra care units for older people which should have regard to the Essex Supported and Specialist Housing and Accommodation Needs Assessment (2025) and provide mixed tenure of market and affordable/social rental over the Plan period in locations with good access to shops and services.	As agreed with Essex County Council in SoCG
M101	90	Policy Hou4 – Specialist Housing Requirements	2b. Proposals that contribute towards the delivery of 138 139 residential care beds and 139 138 extra care nursing care beds over the Plan period by 2044.	Amend paragraph to take into account Essex Supported and Specialist Housing and Accommodation Need Assessment (2025).
M102	90	Para 13.34	The Essex Supported and Specialist Housing Needs Assessment (Housing LIN ECC, May 2025(approved July 2025; dated 4 August 2025)) shows that in Castle Point there is an unmet need for about 130 fully wheelchair-accessible dwellings (M4(3)) at 2024, rising to some 158 households by 2044 (figures are not cumulative).	Amend paragraph to take into account Essex Supported and Specialist Housing and Accommodation Need Assessment (2025).
M103	91	Para 13.39	The Essex Supported and Specialist Housing Needs Assessment which identified a need for 1398 residential care beds and 139 138	Amend paragraph to take into account Essex Supported and Specialist Housing and

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			nursing care home beds by 2044. Development proposals for extra care accommodation should refer to the ECC Extra Care Design Guide (2023) and ECC Market Position Statement in their designs.	Accommodation Need Assessment (2025). As agreed with Essex County Council in SoCG
M104	92	Policy Hou5 – Park Homes	1. New park homes will only be supported on existing Park Home sites as defined on the Policies Map, and subject to compliance with all other relevant policies of this Plan.	The existing wording may be misinterpreted as implying that intensification of Park Homes is automatically acceptable in principle.
M105	92	Policy Hou5 – Park Homes	2. Where applications for new park homes are made, consideration will be given as to whether a condition should be used to restrict the winter use of caravans Parkhomes . Winter use will be restricted where:	Response to the Environment Agency's comments.
M106	92	Para 13.43	13.43 Across the three sites on Canvey (Kings Park, Thorney Bay Park (transitioning to Sandy Bay), and Holehaven Caravan park) and one site in Benfleet (Kingsleigh Park), there are close to 2,000 park homes in Castle Point, predominantly providing accommodation to older people.	Factual correction for clarity and consistency. The replacement of caravans to park homes has resulted in a change of site name.
M107	92	Para 13.45	To this end, the Council will seek to limit the further provision of park homes to the existing caravan sites, and where possible and necessary will restrict new park homes providing residential accommodation to ensure these are not the sole residence where the occupants are likely to be at risk from flooding	Response to the Environment Agency's comments.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			or the effects of cold weather. It should be noted that the siting of most park homes on the existing sites will not require new planning consent as their provision is permitted under the existing consents for the use of the site as a caravan park.	
M108	92	Para 13.46	A Habitats Regulations Assessment will be required at application stage in order to and will need to demonstrate no adverse effects on sites integrity before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M109	93	Policy Hou6 - Gypsy and Traveller Housing Sites Map	Boundaries updated to show extent of pitches that have planning permission (not the area that is tolerated) Key to be updated to show green is Green Belt and red hatching are Orchard Place and Janda Fields, Gypsy and Traveller Housing Sites	To align with the existing planning permissions Consistency and clarity to enable the map to be fully understood
M110	95	Policy E1 – Development on Strategic Employment Land	Within Strategic Employment Areas, and until such time as a Master Plan is approved agreed , Class B development or other 'sui generis' uses will be supported which:	As agreed with Essex County Council in SoCG
M111	95	Policy E1 – Development on Strategic	f. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		Employment Land	Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	
M112	97	Para 14.28	A Habitats Regulations Assessment will be required of any new development at SEL4 (South Canvey Port Facilities), West Canvey and Canvey Town Centre to avoid any and will need to demonstrate no adverse effects on integrity of nearby Habitats sites or functionally linked land before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M113	99	Policy E3 – Development of Local Skills	1. Require major developments to be supported by Employment education and Skills Plans that demonstrate how local training and employment opportunities will be delivered by the development during the construction phase. These will be secured as part of the S106 agreement.	As agreed with Essex County Council in SoCG
M114	100	New para to be inserted after 14.40 ⁷	The Essex and Thurrock Local Skills Improvement Plan (2023) identifies key skills gaps and aims to create a more flexible, responsive education and training system. Key priorities include boosting soft skills, enhancing green skills for a low-carbon economy, developing digital skills, expanding apprenticeships, improving careers guidance, and simplifying the	As agreed with Essex County Council in SoCG

⁷ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			landscape for training providers and employers. The plan emphasises stronger partnerships between employers, training providers, and local authorities to meet the evolving needs of the local economy.	
M115	101	Para 14.49	A Habitats Regulations Assessment will be required of any project aimed at attracting large visitor numbers Centre to avoid any and will need to demonstrate no adverse effects on the integrity of nearby Habitats sites or functionally linked land before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M116	108	Policy TC5 – Hot Food Takeaways and Fast Food Outlets	d. It is within a local shopping parade and no more than 15% of the existing units, {or no more than one unit in a parade}, (whichever is higher) are hot food takeaways or fast food outlets, or e. It is within an out of centre retail park....	Clarification so the intention of the policy is clearer
M117	109	Para 15.31in our town centres and local communities. The national Obesity Strategy highlights that eating out can contribute towards obesity through the consumption of calories out of home food which is high in fat, salt and sugar (HFSS) . Takeaways and promotions in food stores and high street environment can also add to the number of calories consumed.	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M118	109	Para 15.32	<p>This is significant in Castle Point where obesity levels are higher than the national average, with insight from the annual National Child Measurement Programme (NCMP) which monitors the Body Mass Index (BMI) of children in reception and year six. It is therefore necessary to ensure....</p>	As agreed with Essex County Council in SoCG
M119	109	Para 15.36	<p>As a part of a wider package of local and system activity, tThe Essex Healthy Weight Strategy (2024 – 2034), prioritises addressing factors that influence the food environment,...</p>	As agreed with Essex County Council in SoCG
M120	109	Para 15.37	<p>Therefore, the proliferation of hot food takeaway provision in Castle Point is not only affecting the diversity of retail offer in Castle Point, but also contributing towards poor health amongst the resident population. With reference to the Castle Point and Rochford Health and Wellbeing Strategy (2025-2028) There is therefore a clear basis for seeking...</p>	As agreed with Essex County Council in SoCG
M121	109	Para 15.38	<p>The NPPF supports the restriction of hot food takeaways and fast food outlets around schools. Food choices, preferences and habits are formed at an early age and Children are known to be increasingly more vulnerable to obesity than adults. Whilst there is a range of reasons – poor diet quality and</p>	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			diversity at home, lack of exercise or sedentary lifestyles – the access to fast food takeaways is of concern. Restricting access close to schools will assist to discourage children from unhealthy eating and assist in controlling obesity.	
M122	112	Policy D1 – Design Objectives.	o. Ensure opportunities for accessible and inclusive design are taken, enabling people to age well in place and reflecting taking into account the needs of different cultures, and genders and disabilities .	As agreed with Essex County Council in SoCG
M123	112	Policy D1 – Design Objectives. New criteria to be added	Maximise opportunities for encouraging physical activity.	Responding to Sport England comments
M124	112	Policy D1 – Design Objectives. New criteria to be added	Incorporate multifunctional Green and Blue Infrastructure (GBI) into the design to enhance biodiversity, support climate resilience, and improve the quality and connectivity of open spaces	As agreed with Essex County Council in SoCG
M125	112	Para 16.28	Developments have the potential to improve accessibility and local permeability by making places that connect with each other and are easy to move through. This also encourages	Responding to Sport England comments

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			the use of active travel and encourages physical activity. Promoting legibility through development helps to provide recognisable routes, intersections and landmarks to help people find their way around; and make faster journeys. Sport England have also developed '<u>ten principles to inform active design</u>' which provide guidance on how the design of environments can help people lead more physically active and healthy lives.	
M126	114	New para to be inserted after 16.28 ⁸	Development proposals should have regard to the ECC Extra Care Design Guide principles to ensure opportunities for accessible and inclusive design are taken into account, enabling people to age well in place and reflecting the needs of different cultures, genders and disabilities	As agreed with Essex County Council in SoCG
M127	115	Policy D2 – Design on Larger Sites and within Premium	2. Premium sustainability areas are defined as: a. Sites within 800m of a town centre or railway station; and/or b. Sites within 400m of a bus stop with a regular bus service.	As agreed with Essex County Council in SoCG

⁸ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		Sustainability Areas		
M128	115	Para 16.34	These facilities are largely located within town centres. A distance of 400m from a bus stop is a key benchmark representing a reasonable walking distance for people of all abilities to access public transport services. “ The service should provide a good level of frequency in order to make reasonable journeys to work, school and to access community services.	As agreed with Essex County Council in SoCG
M129	116	Policy D3 – Master Planning	2. In preparing the Master Plan, the Council requires the applicant to demonstrate how they have engaged with and sought the views of relevant landowner(s), key stakeholders, infrastructure providers and the local community.	Policy addition responding to consultation comments of Essex & Suffolk Water and agreed in Statement of Common Ground.
M130	116	Para 16.38 and new para to be inserted ⁹	16.38 The Council will work with those promoting development, the local communities and infrastructure providers to ensure that Master Plans accurately reflect the vision and the policy requirements in this Plan but also local aspirations and preferences concerning	In response to Natural England comments and as agreed in SoCG

⁹ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>layout, style, character and relationship to adjoining land uses.</p> <p>16.39 In line with the wider plan vision, the masterplan offers an opportunity to outline how multifunctional green infrastructure has been integrated into a scheme to create high-quality, sustainable places. It will also ensure that GI is considered from the outset as an important piece of infrastructure in new developments.</p>	
M131	117	Policy D4 - Landscaping	2. Pre-existing natural features, including hedgerows, ponds, streams, ditches should be retained and incorporated within the design scheme layout as far as possible.	As agreed with Essex County Council in SoCG
M132	117	Policy D4 - Landscaping	3.The most appropriate tree should be planted within the development, compatible with highways standards having regard to the Essex Design Guide, Highways Technical Manual - Planting in Sight Splays and the needs of different users	As agreed with Essex County Council in SoCG
M133	117	Policy D4 - Landscaping	4 e. Connectivity to the wider Green and Blue Infrastructure (GBI) network by enhancing ecological connectivity,	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			supporting biodiversity, and integrating nature-based solutions that promote climate resilience	
M134	118	New Para to be inserted after para 16.48 ¹⁰	Waterside developments should provide appropriate riparian life-saving and safety equipment) as recommended by the Port of London Authority 'A Safer Riverside Guidance' and the 'Drowning Prevention Strategy' (2019) produced by the Tidal Thames Water Safety Forum.	Responding to consultation comments of Port of London Authority
M135	120	Policy D6 – Residential Annexes	1d. Flood Risk: The design of annex or extensions should include flood resistance and/or resilience measures to allow the development to be quickly brought back to use without significant refurbishment following a flood event. For single storey dwellings, a place of safety/refuge above the assessed level of flooding from any source should be provided wherever possible.	In response to the Environment Agency's comments.
M136	124	Policy D9 – Conserving and	2. Reference <u>shall</u> should be made to the <u>South Benfleet Conservation Area</u>	Responding to Historic England comments including additional hyperlinks added.

¹⁰ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		Enhancing the Historic Environment	<p><u>Management Plan and the Florence Gardens Conservation Area Management Plan</u>, as relevant, when determining planning applications in these areas. The <u>South Benfleet Conservation Area Design Code</u> should must be applied when preparing and assessing proposals within the South Benfleet Conservation Area.</p> <p>3. Regard should shall be had to the Historic Environment Record in determining if archaeological remains are present within a proposed development site. Where remains are present, the Council will have regard to the archaeological importance of those remains, the need for the development, the likely extent of any harm, and the likelihood of the proposal successfully preserving the archaeological interest of the site when considering proposals effects on archaeology.</p>	
M137	124	Para 16.72	<p>There are several designated and non-designated historic assets in the Borough. Whilst heritage assets are distributed throughout the Borough, there is a large</p>	Responding to Historic England comments to include additional hyperlinks.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			<p>concentration of listed buildings in the High Street in South Benfleet. This area was designated as the South Benfleet Conservation Area in 1988, and benefits from a <u>Conservation Area Management Plan</u>. This was recently updated to reflect the change that has occurred in this area. A <u>design code</u> has been developed to ensure future developments contribute to the quality of this heritage asset.</p>	
M138	124	Para 16.73	<p>Florence Gardens in Hadleigh has also been designated as a conservation area, taking into account the design, layout, and uniformity cottages in the area, and benefits from a <u>Conservation Area Management Plan</u>.</p>	Responding to Historic England comments to include additional hyperlinks.
M139	124	Para 16.75	<p>Essex County Council's <u>Essex Historic Environment Record (EHER) database</u> holds records for other significant archaeological finds in Castle Point.</p>	Responding to Historic England comments to include additional hyperlinks.
M140	125	Para 16.76	<p>There are also significant areas of Castle Point that are undeveloped, and the information on the <u>Essex Historic Environment Record</u> shows the potential for large parts of this undeveloped area of Castle Point to contain previously unidentified heritage assets</p>	Responding to Historic England comments to include additional hyperlinks.

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M141	127	Policy GB1 – Development affecting the Green Belt	1. Development W ithin 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 .	As agreed with Essex County Council in SoCG
M142	126	Para 17.2	The Green Belt covers 55.9% 53% of the Borough's area and it tightly bounds the existing urban area.	Factual correction to consistently refer to the % of the Borough (not just the land within the Borough) that is covered by Green Belt. This will align with para 3.16 of the Plan.
M143	129	Policy GB2 – Previously Developed Land in the Green Belt	1a. The site is in a high, good or moderately accessible location as identified on the map at Appendix D, and has safe footway access, conforming to established highway regulations;	As agreed with Essex County Council in SoCG
M144	128	Para 17.8	A Habitats Regulations Assessment will be required of any substantial new development within 2km of a Habitats site or Holehaven Creek SSSI (as functionally linked land) to avoid any and will need to demonstrate no adverse effect on the integrity of nearby Habitats sites before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M145	130	Para 17.26	A Habitats Regulations Assessment will be required of any substantial new development	In response to Natural England comments and as agreed in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			within 2km of a Habitats site or Holehaven Creek SSSI (as functionally linked land) at application stage, to avoid any and will need to demonstrate no adverse effect on the integrity of nearby Habitats sites before development can be granted permission.	
M146	131	Policy ENV1 - Protecting and Enhancing the Landscape and Landscape Features	2. Development proposals should seek to protect, and enhance and increase the connectivity of key natural/ semi-natural and historical features including:	Responding to consultation comments of the Woodland Trust
M147	131	Policy ENV1 - Protecting and Enhancing the Landscape and Landscape Features. New criteria to be added.	4. Development proposals should be designed to reflect character, features and priorities of established Landscape Character Areas and landscape assessments.	In response to Natural England comments and as agreed in SoCG.
M148	132	New paragraph to be inserted after 18.6 ¹¹	The Natural England <u>National Landscape Character Areas</u>, as well as local Essex Landscape Character Assessments provide a way of understanding how the landscape and its elements contribute to local	In response to Natural England comments and as agreed in SoCG.

¹¹ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			character, sense of place, and local distinctiveness can be preserved and enhanced. Canvey and southern areas of the Borough form part of the Thames Estuary Landscape Character Area, while northern parts of the Borough form part of the Northern Thames Basin/South Essex Coastal Towns Landscape Character Area	
M149	133	Policy ENV2 – Coastal & Riverside Strategy	1. Working with the Environment Agency, ECC Lead Local Flood Authority, neighbouring authorities, the community, the Port of London Authority and other relevant stakeholders the Council will prepare a Riverside Strategy.	Responding to consultation comments of Port of London Authority
M150	133	Policy ENV2 – Coastal & Riverside Strategy	4. Proposal will be subject to a Habitats Regulations Assessment in order to demonstrate no adverse effects on site integrity.	For clarity and consistency.
M151	133	Policy ENV2 – Coastal & Riverside Strategy	5. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	As agreed with Essex County Council in SoCG
M152	133	Policy ENV2 – Coastal & Riverside Strategy	6. Development proposals must ensure areas that are identified as an Area of Particular Importance for Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS), and priority habitats such as	Responding to consultation comments of Essex Wildlife Trust and RSPB

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			<p>coastal floodplain grazing marsh, mudflats and coastal saltmarsh are protected and where possible enhanced.</p> <p>7. Proposals for flood defence improvements should seek to deliver biodiversity benefits alongside flood protection.</p>	
M153	134	Para 18.15	<p>It is important for future generations that new development does not hamper the delivery of the Riverside Strategy, and to this end, it will be a material planning consideration when determining applications within the vicinity of the coast. Coastal and riverside areas are subject to environmental protection under elements 3-7 of policy ENV2, as well as other policies within the plan, which provide assurance of their appropriate consideration and protection the interim period prior to the publication of the Riverside Strategy.</p>	Responding to consultation comments of Essex Wildlife Trust
M154	134	Para 18.16	<p>A Habitats Regulations Assessment will be required at application stage in order to demonstrate no adverse effects on site integrity. The Riverside Strategy must be</p>	In response to Natural England comments and as agreed in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			subject to a Habitats Regulations Assessment in order to and will need to demonstrate no adverse effects on site integrity. This will need to take into account the Castle Point Plan when considering in combination effects.	
M155	135	Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain	<p>a. Applying the principles related to the biodiversity mitigation hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy, In Castle Point, including ancient woodlands are considered to constitute irreplaceable habitats</p> <p>b. Where appropriate, large scale residential developments (500 units + or equivalent) within the Zones of Influence will be required to provide sustainable Suitable Accessible Natural Greenspace (SANG) or SANG-like provision. This should be defined as providing a minimum of 8Ha per 1,000 new population of accessible semi-natural greenspace with a minimum 2.3km circular walk on-site. Alternatively, developments may be able to contribute to the uplift an</p>	In response to Natural England comments and provisionally agreed in SoCG.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			existing greenspace (e.g. a Country Park) to SANG standard.	
M156	136	New para to be inserted after 18.19 ¹²	As set out in the NPPF, development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons. In line with the regulations, such irreplaceable habitats are also excluded from biodiversity net gain calculations since it is recognised that loss of irreplaceable habitats always results in net biodiversity loss. Biodiversity net gain should be subject to maintenance and monitoring for at least 30 years.	Responding to comments from the Woodland Trust
M157	136	Para 18.23 and 18.24	18.23 A Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) has been prepared for the Essex Coast Habitats Sites to address this cooperatively across Essex. This, together with any future updated iterations , sets out a series of actions to be taken to avoid adverse in-combination effects upon Essex Coast Habitats Sites to these habitats . The Strategy identifies a Zone of Influence (ZOI)	In response to Natural England comments and as agreed in SoCG. Merge Paragraph 18.24 into 18.23 together as they both address RAMs. This allows for the creation of a new paragraph 18.24 to address SANG.

¹² Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>around each Habitats sites in Essex where recreational disturbance is likely to result from residential development.</p> <p>18.24: The RAMS tariff addresses in-combination adverse effects on the integrity of the Essex Coast Habitats Sites. However, large sites (500+) with alone adverse effects from recreational disturbance will also need to mitigate via on-site SANG (Suitable Alternative Natural Greenspace) provision at a rate of 8ha/1000 new population, as recommended by Natural England following receipt of updated Visitor Survey evidence by Footprint Ecology on behalf of the Essex Coast Partner LPAs. SANGs are areas that are designated with the aim of protecting ecologically sensitive protected sites like Special Protection Area (SPA) from recreational disturbance/pressures by providing alternative green space for people to visit. SANG need to conform to the latest Natural England SANG guidelines. Where SANG or equivalent is provided, the</p>	

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			RAMs tariff still applies, because in such cases, the Essex RAMS tariff mitigates for residual effect of these large sites, as no amount of on-site greenspace will prevent all visits to the coast, nor is that desirable.	
M158	137	Para 18.29	18.29 The Environment Act 2021 introduced Biodiversity Net Gain. This mandates that most developments should deliver at least 10% biodiversity net gain, using a specific metric developed by the Government. Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex. For developments adjacent to watercourses the Water Framework Objectives should be utilised.	Responding to the Environment Agency's comments
M159	137	Para 18.31	The Castle Point Green and Blue Infrastructure Strategy and Open Space Assessment have both considered a number of sites across Castle Point for their potential suitability for off-	Responding to comments of Essex Wildlife Trust

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>site biodiversity net gain. Of those sites that have been assessed as having significant potential biodiversity enhancement and are either owned by the Council or have been promoted for inclusion in the Plan for biodiversity, are identified as the first tranche of preferred offsite biodiversity net gain sites. The need for further off-site biodiversity net gain sites will be kept under review and the preferred list expanded further, in response to demand and availability.</p>	
M160	138	Policy ENV4 - Local Wildlife and Geological Sites	<p>4. Development proposals which would result in the loss of or harm to either a Local Wildlife Site, Local Geological Site, or a Potential Local Wildlife Site will not be permitted be refused unless it can be clearly demonstrated that every reasonable effort has been taken to minimise the harm arising through avoidance, and any residual harm arising is fully mitigated. there are exceptional reasons to justify development in that location. Proposals must demonstrate that every reasonable effort has been taken to minimise harm through avoidance, and any residual harm must be fully mitigated.</p>	Responding to objection from Essex Wildlife Trust
M161	138	Policy ENV4 - Local Wildlife	<p>5. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the</p>	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		and Geological Sites	Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).	
M162	139	Policy ENV5	1. For any grant of planning permission for new build developments greater than 5 metres in height, that there must be a minimum average of one swift brick or box per dwelling or unit. Where feasible, swift bricks integrated into walls must be installed in preference to external swift nest boxes, following best practice guidance (British Standard BS 42021:2022 or equivalent)	Responding to comments from Swifts Local Network: Swifts & Planning Group, and correcting a typographical error.
M163	140	Para 18.42and the Council's commitment to nature conservation, local policy has addressed this issue. The policy stipulates an average of at least one Swift brick/box per dwelling/unit, so where practical to do so they can be in clusters of greater than 3, since Swifts are a communal species.	Responding to comments from the RSPB
M164		Para 18.43 National Hedgehog Conservation Strategy, published in October 2024. 'Conservation' fencing, such as predator exclusion fences installed on reserves by conservation organisations, may be exempt from the requirement, as appropriate.	Responding to comments from the RSPB

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M165	141	Para 18.53	The supporting background evidence paper 'Agricultural Land in Castle Point' should be referred to for further detailed evidence to this policy. agricultural quality.	Typographical error.
M167	142	Policy Infra1 – Community Facilities	3d. Be located in a sustainable location, with access to adequate and within walking distance of public transport provision, cycling and walking links;	As agreed with Essex County Council in SoCG
M168	142	Policy Infra1 – Community Facilities	5. In relation to the loss of a locally valued community facility that is commercial in nature, such as a public houses, private healthcare facility or a nursery , evidence will need to be submitted to demonstrate that the use is not economically viable and that it is no longer required to meet the needs of the local community. This should include demonstrable evidence that the facility had been placed on the open market for a period of at least one year at the standard market rate, without success.	As agreed with Essex County Council in SoCG
M169	143	Para 19.7	Community facilities represent a considerable stock of brownfield land supply in the Borough. Many of these schools, community halls and GP surgery community buildings within the Borough are ageing and have issues accommodating the services required....	As agreed with Essex County Council in SoCG
M170	143	Para 19.10	Therefore, community buildings should be designed to allow for disabled access and	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>should be located in order to provide the opportunity for as many people as possible to access the facility by foot and/or by public transport. Planning applications should provide details of how accessibility has been considered within the design of the development.</p>	
M171	143	New para to be inserted after 19.12 ¹³	<p>The loss of any community facilities must be fully justified. The Local Planning Authority will require any application involving the loss of a facility to be supported by written evidence and applicants should contact the Local Planning Authority at the earliest stage to discuss the details.</p>	Agreed in Statement of Common Ground with NHS Property
M172	143	Para 19.13	<p>For the purposes of this Policy, community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, education facilities, libraries, community halls, criminal justice facilities meeting rooms, places of worship, cemeteries and burial grounds, public toilets, pubs and post offices.</p>	<p>Responding to Environment Agency's comments</p> <p>As agreed with Essex County Council in SoCG</p>

¹³ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M173	143	New para to be inserted after 19.15	For development proposals relating to cemeteries and burial grounds, there should be regard to the guidance for Cemeteries and burials; <u>Protecting groundwater from human burials</u> and <u>The Environment Agency's Approach to Groundwater Protection.</u>"	Responding to Environment Agency's comments
M174	144	Policy Infra2 – Education, Skills and Learning	1. The change or use or redevelopment of educational establishments, identified on the Policies Map , will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements.	As agreed with Essex County Council in SoCG
M175	144	Policy Infra2 – Education, Skills and Learning. New criteria to be added	4.The Council will seek to improve local skills and access to employment opportunities through Employment and Skills Plans.	As agreed with Essex County Council in SoCG
M176	144	Para 19.17	For the purpose of this policy, education facilities include, but are not limited to early years and childcare (full day care, pre-schools, child minders, school run early years provision, and 'wrap around care' – breakfast, after school and holiday clubs), schools (primary, secondary and Post 16 Education), Special Education Needs and Disabilities (SEND), colleges, libraries, youth facilities, employment	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			and skills measures and other community learning spaces	
M177	148	Policy Infra3 – Improving Health and Wellbeing. New clause to be inserted after e. ¹⁴	f. Expecting all development proposals to be planned and designed to encourage more active and healthier lifestyles;	Responding to Sport England's comments
M178	149	Para 19.44	More broadly, the Council will work with the NHS, Public Health and other partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issues and priorities emerging through the Joint Strategic Needs Assessment (JSNA), and the Essex Joint Health and Wellbeing Strategy and the Castle Point and Rochford Health and Wellbeing Strategy . This will not only involve	As agreed with Essex County Council in SoCG
M179	149	Para 19.50	The Essex Healthy Places Document is an advice note on how planners, developers and designers can incorporate health into proposals and the key attributes in creating healthy places.	As agreed with Essex County Council in SoCG

¹⁴ Please note renumbering of criteria in Policy Infra3 will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M180	149	New para to be inserted after 19.50 ¹⁵	<p>Designing developments to promote active and healthier lifestyles is central to creating sustainable communities. Incorporating walking, cycling, green spaces, and accessible sports facilities encourages daily activity, supports wellbeing, and reduces car dependency. Development proposals should have regard to the <u>Sport England Active Design Guidance</u>.</p>	Responding to Sport England's comments
M181	150	Policy Infra4 - Open Spaces	<p>6. New open spaces will be required for major developments on grey belt sites and greenfield sites in the urban area, according to the Open Space Needs Assessment quantity, access and quality standards. These will be required where there is a deficiency (by quantity or access) of open space types, or where the implementation of the development itself will lead to a deficiency. The benchmark scale of development that is normally expected to provide equipped/designated open spaces on site is as follows</p>	In response to Natural England comments and a typo
M182	150	Policy Infra4 - Open Spaces	7. Where part 9 6 of this policy applies to a proposal for older peoples' accommodation,	Typographical error

¹⁵ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			equipped play spaces for children and young people will not be required.	
M183	151	Para 19.52	<p>The Castle Point Open Space Needs Assessment recommends standards for ensuring there is an adequate provision of open space across the Borough over the Plan period are set out below. It The assessment establishes quality standards for a whole range of different types of open spaces, and quantity and accessibility standards for the most common types of open space. Meeting these standards will also ensure that Natural England's 3ha/1000 population accessible greenspace standard is achieved.</p> <p>Add Title to Table under para 19.52 Table x: Open Space Needs Assessment Quantity, and Access Standards</p> <p>Delete final column in table 'Additional open space to be delivered' (unrelated reference from 2023 evidence study)</p>	In response to Natural England comments and typographical error

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification				Reason/Justification
			Typology	Quantity standards (ha/1,000 pop)	Access standard (walking time, straight line)	Additional open space to be delivered over the plan period	
			Allotments	0.2	15 mins (720m)	2.45 Ha	
			Amenity Green Space (sites >0.1 Ha)	0.6	10 mins (480m)	7.34 Ha	
			Parks and Recreation Grounds	1.1	15 mins (720m)	13.46 Ha	
			Play Space (Children)	0.07	10 mins (480m)	0.87 Ha	
			Play Space (Youth)	0.07	15 mins (720m)	0.87 Ha	
			Accessible Natural Green Space	1.80	15 mins (720m)	22.03 Ha	
			Total for new provision	3.84		47.02 Ha	
M184	151	Para 19.56	A Habitats Regulations Assessment will be required at application stage for any facility near to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked				In response to Natural England comments and as agreed in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>land) before development can be granted permission, in order to and will need to demonstrate no adverse effects on site integrity. Where 8Ha per 1,000 new population of on-site SANG is required under Policy ENV3, this will replace the requirement for the Accessible Natural Green Space element of open space requirements detailed in Table x above.</p>	
M185	154	Policy Infra6 – Communications Infrastructure	<p>2b. an assessment of whether there would be any impacts of the proposal to individuals or groups protected under the equalities act, by carrying out an Equality Impact Assessment and identifying any appropriate mitigation measures; and</p>	<p>In response to EM Radiation Research Trust and to reflect latest case law.</p>
M186	154	Para 19.70	<p>However, initial roll out of 5G provision has highlighted some design, layout and siting concerns that need to be addressed in future provision. Use of existing masts, buildings and other structures should be encouraged. Where new sites are required (such as for new 5G networks) equipment should be sympathetically designed and camouflaged where appropriate. The Essex Design Guide includes a section on 'Planning for 5G'....</p>	<p>As agreed with Essex County Council in SoCG</p>

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M187	156	Para 20.4	...The Net Zero: Making Essex Carbon Neutral report details an Avoid, Shift and Improve approach for reducing transport emissions:	As agreed with Essex County Council in SoCG
M188	156	Para 20.6	ECC are currently in the process of updating the LTP, with a new LTP4 scheduled for adoption in <u>2025 winter 2026</u> .	As agreed with Essex County Council in SoCG
M189	157	Policy T1 - Transport Strategy	9. Supporting the use of the Tidal Thames for both passengers and freight	Responding to consultation comments of Port of London Authority
M190	159	New paragraph to be inserted after 20.29 ¹⁶	Supporting the use of the Tidal Thames for both passengers and freight aligns with wider objectives to secure the transport infrastructure needed to support growth, to secure the delivery of net zero development and for a River Thames that is more accessible to be enjoyed by all.	Responding to consultation comments of Port of London Authority
M191	160	Policy T2	7. The Council will resist development that would cause unacceptable impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions or where cumulative impact on the road network would be severe.	Responding to consultation comments by Taylor Wimpey to ensure accordance with the NPPF.
M192	160	Policy T2	9. Any improvements to accessing Canvey Island must avoid any adverse effects on the integrity of Habitats sites and minimise impacts on designated sites, priority	Responding to RSPB comments

¹⁶ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			habitats and species, including functionally linked land and habitat connectivity.	
M193	161	Para 20.28 Work on initial improvements to the Fairglen Interchange (short term) is expected to commence in due course 2025.	As agreed with Essex County Council in SoCG
M194	161	Para 20.30Any improvements to the access to Canvey Island must avoid any adverse effects on the integrity of Habitats Sites. A Habitats Regulations Assessment will be required to demonstrate no adverse effects on site integrity before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M195	162	Policy T3 – Active Travel Improvements	3. Developments will be required to make appropriate and proportionate financial contributions towards active travel improvements within the Borough taking into account requirements of the Infrastructure Delivery Plan.	As agreed with Essex County Council in SoCG
M196	162	Para 20.33	...As Castle Point has a population that is older than average, this wider definition it is important in ensuring that active travel infrastructure supports the whole community, including those who are less able, and are at risk of social isolation. <u>Development proposals should have regard to the ECC Extra Care Design Guide principles to ensure opportunities for accessible and</u>	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<u>inclusive design are taken, enabling people to age well in place and reflecting the needs of different cultures, genders and disabilities.</u>	
M197	163	Para 20.40	A Habitats Regulations Assessment will be required at application stage in order to and will need to demonstrate no adverse effects on site integrity before development can be granted permission.	In response to Natural England comments and as agreed in SoCG
M198	166	Para 20.55	All D evelopments that generate significant amounts of movement may will be required to produce a Travel Plan having regard to the thresholds in Essex County Council published guidance.	As agreed with Essex County Council in SoCG
M199	167	New para to be inserted after 20.59 ¹⁷	Development should have regard to the Schools Design Guidance (May 2025) which provides guidance on school designs which are well-integrated into the community, with connections to pedestrian, cycle, and public transport networks, encouraging active travel and reducing car dependence. This integration supports the creation of vibrant, inclusive public spaces designed to enhance social interaction and community cohesion.	As agreed with Essex County Council in SoCG

¹⁷ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M200	168	Policy T7 – Parking Provision	1. Proposals for development will be required to make provision for all users having regard to the EPOA Essex Parking Guidance (Part 1 and 2) prepared by EPOA.	As agreed with Essex County Council in SoCG
M201	168	Policy T7 – Parking Provision	3. Proposals for development will be required to have regard to the Electric Vehicle Charging Standards set out in the Essex EPOA Parking Guidance prepared by EPOA .	As agreed with Essex County Council in SoCG
M202	168	Para 20.63	<p>The Essex Planning Officers Association's (EPOA) Essex Parking Guidance Standard (2024) were prepared with both the above balancing act in mind, and the need to move towards a net zero transport network.</p> <p>.....and Part 2 – for Garden Communities and Large-Scale Developments (including a 'Connectivity Tool'), where large is considered 1,000 homes or more. A study was commissioned to understand parking needs across Essex...</p>	As agreed with Essex County Council in SoCG
M203	169	Para 20.69	The ECC Essex Local Transport Plan Development Management Policies sets out within its highways planning advice specific requirements for developments that are likely to be regularly accessed by HGVs at policy DM19.	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M204	169	Para 20.71	<p>....This standard appears appropriate for other servicing and delivery vehicles that occasionally access many developments also.</p> <p>Design Guidance on Street Design with respect to waste collection can be found in the Essex Design Guide- Highways Technical Manual.</p>	As agreed with Essex County Council in SoCG
M205	170	Policy SD1 - Tidal Flood Risk Management	<p>1b. New bungalows and other forms of self-contained residential accommodation at ground level including extensions and annexes, will be refused on Canvey Island unless an internally accessible and suitably sized and designed place of refuge above the predicted flood floor levels can be provided within the development, and favourable consideration will be given to the conversion of bungalows to houses, subject to those privacy, amenity and urban design considerations set out in the Castle Point Design Code;</p>	In response to the Environment Agency's comments
M206	171	Policy SD1 - Tidal Flood Risk Management	<p>6. Development proposals must ensure that habitats sites are not adversely effected and be in accordance with Policy ENV2 – Coastal & Riverside Strategy.</p>	As agreed with Essex County Council in SoCG
M207	172	Para 21.13	<p>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</p>	Modification in response to comments/requests from Natural England on the HRA and the Environment Agency's comments.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			<p>have already been delivered to the Island's southern revetments and will be required over the next 40 years to keep up with climate change. The Council will work with the Environment Agency to ensure that these ongoing improvements are planned, receive full funding from relevant sources and 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>	
M208	172	Para 21.14	<p>21.14 The current preferred tidal flood risk management policy for the tidal defences within the TE2100 Plan's Canvey Island policy unit is to take further action to keep up with climate and land use change so that flood risk does not increase. In order to help deliver the TE2100 Plan's aspirations for the Canvey Island policy unit, it is necessary for land adjacent to tidal defences to be left free from development as far as possible. This is to provide the space for the permanent footprint required of larger defences. Accessibility is also essential in delivering such improvements (both for facilitating the construction of new defences as well as for vehicular access (4x4</p>	<p>In response to the Environment Agency's comments.</p>

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>or construction plant) to maintain and inspect and repair the defences over their lifetime). The Environment Agency has advised that a minimum 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose.</p>	
M209	172	Para 21.15	<p>Developers are encouraged to enter into discussions with the Environment Agency at a very early stage when formulating development proposals close to or within the safeguarded sea defence area and where appropriate The Riverside Strategy. Flood Risk Activity Permits were introduced under the Environmental Permitting (England and Wales) (Amendment) (No.2) Regulations in April 2016. Early discussions with the Environment Agency will avoid the potential for costly development design and layout revisions or to avoid the risk of having a flood risk permit application refused by the Environment Agency. Flood Risk Activity Permits are separate to the planning application process and are required by the Environment Agency for certain activities within set distances from tidal defences – further guidance is set out by the Environment Agency.</p>	<p>In response to the Environment Agency's comments.</p>
M210	173	Para 21.17	<p>21.18 The loss of inter -tidal marshland habitats.....</p>	<p>Formatting error. Paragraph 21.17 currently ends with a sentence ending</p>

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>21.19 The London Fenchurch Street to Southend railway line....</p>	<p>in a colon. Paragraphs 21.18 and 21.19 need to be sub-clauses of 21.17.</p>
M211	173	Para 21.18	<p>The loss of inter-tidal marshland habitats. The Benfleet and Southend Marshes is designated as a Special Protection Area (SPA) and is recognised for its assemblage of migratory birds under the Ramsar Convention. As a consequence, there is a need to identify compensatory habitat. The TE2100 Plan seeks to identify compensatory 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>	<p>Modification in response to comments/requests from Natural England on the HRA.</p>
M212	174	Policy SD2 - Non-Tidal Flood	<p>2. Only essential infrastructure or water compatible types of development will be supported in areas identified by the Castle Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b), subject to</p>	<p>In response to the Environment Agency's comments.</p>

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
		Risk Management ¹⁸	compliance with all other relevant policies of this Plan.	
M213	174	Policy SD2 - Non-Tidal Flood Risk Management	Where a development proposal is for a site in an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area, a drainage strategy will be required to demonstrate how both on and off-site flood risk will be managed, and mitigation measures should be satisfactorily integrated into the design and layout of the development to provide betterment to the community by reducing flood risk. Any natural or semi-natural water features such as ditches, dykes and ponds must be retained in their natural or semi-natural form to maintain existing attenuation provision and existing flow paths.	As agreed with Essex County Council in SoCG
M214	175	Para 21.28 ¹⁹	21.28 21.29 In terms of fluvial flooding, the SFRA 2024....	Paragraph numbering has included 21.28 twice, formatting error.
M215	175	Para 21.28	ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood and Water	As agreed with Essex County Council in SoCG

¹⁸ Please note the renumbering of this policy will be required as a result of this modification

¹⁹ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>Management Map identifies Critical Drainage Areas (CDAs), these are areas, where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. Where a development proposal is within a CDA, a drainage strategy will be required to demonstrate how surface water flooding on site will be managed and how the site will mitigate the risk of increasing flooding downstream. Drainage strategies should comply with the Sustainable Drainage Systems Guide for Essex. In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the 1in1 year greenfield rate for all events up to the 1in100 event plus climate change. Sites should follow the drainage hierarchy and utilise above grounds SuDS where possible, including SuDS for conveyance and they should be included in the landscape strategy.</p> <p>There are seven identified CDAs in Castle Point covering Most of the Borough's land area. There are as follows....</p>	

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M216	175	Para 21.28	<p>Recommendation of the Level 1 SFRA which includes text on how applications for redevelopment of previously developed sites located within mapped areas of Functional Floodplain would be considered.</p> <p>In terms of fluvial flooding, the SFRA 2024 identifies the Prittle Brook and Benfleet Hall Sewer, as being sources of fluvial flood risk. Fluvial flooding is also possible from the watercourses and dykes that form the drainage system on Canvey Island, due to the flat and low-lying topography of the island and the finite capacity of the culverted sections of the drainage infrastructure. Some of this network drains to tide via flapped outfalls which only operate at low-tide. If water were to overtop these dykes, the flat topography of the Borough could cause it to disperse over large areas.</p>	In response to the Environment Agency's comments.
M217	176	Para 21.32	<p>All developments on Canvey Island will need to avoid any adverse effects on site integrity. A Habitats Regulations Assessment will be required at application stage to demonstrate no adverse effects on site integrity before development can be granted permission.</p>	In response to Natural England comments and as agreed in SoCG
M218	177	Policy SD3 – Sustainable Drainage Systems (SuDS)	<p>2. All major qualifying development, will be required to submit a drainage strategy to demonstrate that the surface water hierarchy has been followed, how both on and off-site</p>	Agreed in the Anglian Water SoCG

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			flood risk will be managed and how mitigation measures should will be satisfactorily integrated into the design and layout of the development.	
M219	177	Policy SD3 - Sustainable Drainage Systems (SuDS)	3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA) .	Several objectors concerned that SuDS need to respond more to the specific constraints and circumstances of Canvey. The SFRA does contain advice on this as well as specific recommendations for those allocated sites in the Castle Point Plan and should also be cross-referenced.
M220	177	21.34	Essex County Council has prepared a SuDS Design Guide for Essex. This not only addresses technical requirements for SuDS, but also details how SuDS can be integrated into the design and layout of development to offer wider environmental benefits, and form part of the multi-functional green infrastructure provision. <u>The Environment Agency's Approach to Groundwater Protection should also be considered, particularly statements G1 and G9 to G13 and National standards for sustainable drainage systems.</u>	In response to the Environment Agency's comments

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
M221	177	New para to be inserted after 21.34 ²⁰	Qualifying development is major development (as defined in the GPDO) and minor development which seeks to connect to the public sewerage network.	Agreed in the Anglian Water SoCG
M222	179	Policy SD4 – Net Zero Carbon Development (In Operation)	<p>A) New build development (residential and non-residential)</p> <p>All new buildings must shall be designed and built to be Net Zero Energy and Carbon in operation at occupation or, in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use.</p>	As agreed with Essex County Council in SoCG
M223	179	Policy SD4 – Net Zero Carbon Development (In Operation)	<p>3. Requirement 3: Energy Use Intensity (EUI) limits</p> <p>The following non-residential buildings must achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:</p> <ul style="list-style-type: none"> • Offices – 70 kWh/m² GIA/year; • Schools – 65 kWh/m² GIA/year ; 	As agreed with Essex County Council in SoCG

²⁰ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<ul style="list-style-type: none"> Light Industrial – 35 kWh/m² GIA/year; <p>On larger sites in exceptional circumstances this may be met on each individual phase as a site-wide residential average (weighted by floor area) provided that no single dwelling has an EUI greater than 45 kWh/m² GIA/yr</p>	
M224	179	Policy SD4 – Net Zero Carbon Development (In Operation)	<p>4. Requirement 4: Renewable energy must be generated on-site for all new developments by whichever of the following results in the greater amount of rooftop solar PV energy (electricity) generation: and</p> <p>a. The amount of energy generated in a year should match or exceed the predicted annual energy use of the building, i.e. Renewable energy generation (kWh/m²/year) = or > predicted annual energy use (kWh/m²/year); or</p> <p>b. The amount of energy generated in a year is:</p> <ul style="list-style-type: none"> at least 80 kWh/m² building footprint per annum* for all building types; and at least 120 kWh/m² building footprint per annum for industrial buildings. 	As agreed with Essex County Council in SoCG
M225	180	Policy SD4 – Net Zero Carbon	<p>B) Extensions and Conversions</p>	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		Development (In Operation)	Applications for residential extensions and conversions affecting existing buildings....	
M226	180	Policy SD5 – Net Zero Carbon Development (Embodied Carbon)	Policy SD5 – Net Zero Carbon Development (Embodied Carbon and Circular Economy)	As agreed with Essex County Council in SoCG
M227	181	Para 21.41	<p>Evidence commissioned by the Climate and Planning Unit of Essex County Council on behalf of all the Greater Essex local authorities to demonstrate that building to the net zero carbon (in operation) standard set out in Policy SD4 is published and updated where necessary on the Essex Design Guide ECAC demonstrates that building to the net zero carbon (in operation) standard set out in Policy NZ1 is:</p> <ul style="list-style-type: none"> • Technically feasible (Report 1: Essex Net Zero Policy – Technical Evidence Base by Introba, Etude, Currie & Brown, July 2023 and Report 2: Essex Net Zero Policy – Policy Summary, Evidence, and Validation Requirements by Introba, Etude, Currie & Brown July 2023); • Financially viable (Net Zero Carbon Viability Study for Essex by Three Dragons, August 2022); and the Net Zero Carbon Viability and 	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>Toolkit Study, Essex Climate Action Commission October 2025) and</p> <ul style="list-style-type: none"> • Legally justified (Essex Open Legal Advice – Energy policy and Building Regulations by Estelle Dehon KC, Cornerstone Barristers, April 2023). 	
M228	181	Para 21.43	<p>The outcomes of this work have fed into the EPOA Planning Policy Statement Position – Operational Energy and Carbon (Net Zero) and EPOA Planning Policy Statement – Embodied Carbon and Circular Economy. These documents set out the Essex-wide model policies upon which policies SD4 and SD5 are based and the documents provide an explanation of each of the different policy requirements in detail. for Net Zero Carbon Homes and Buildings in Greater Essex document. This sets out policies SD4 and SD5 and provides an explanation of each of the different policy requirements in detail. This should be referred to when interpreting this policy. These documents should be referred to when interpreting policies SD4 and SD5 respectively.</p>	As agreed with Essex County Council in SoCG
M229	182	Policy SD6 - Pollution Control	2. Development proposals should must be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a	In response to the Environment Agency's comments

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity. This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise, light, odour, heat, dust and vibrations.	
M230	183	21.52 (21.53 number removed and paragraphs merged)	21.52 The Environment Agency's Thames River Basin Management Plan identifies that the lower Thames Estuary is of a moderate quality in terms of its ecological status and is failing to achieve a good chemical status. The Water Environment (Water Framework Directive) Regulations 2017 aims to secure no further deterioration of waterbodies and to ensure that the status of waterbodies is improved. Whilst the Thames Estuary is the main waterbody in Castle Point to which this applies, it also applies to all other main rivers in the Borough. 21.53 The Habitats Regulations Assessment identifies that new development is likely to impact on water quality...	In response to the Environment Agency's comments
M231	183	21.54	ECC as the LLFA will not support developments that propose to connect surface water to foul sewers as these systems can become overwhelmed, increasing the risk of	In response to the Environment Agency's comments

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>flooding and pollution occurring. SuDS features should be designed in line with the updated Construction Industry Research and Information Association (CIRIA) SuDS Manual (CIRIA C753) and <u>National standards for sustainable drainage systems</u>, particularly Standard 4 water quality and The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13. Water quality Management guidance can be found within Chapter 26 of the manual. When choosing potential SuDS features, consideration around ground conditions and contamination is paramount. Infiltration SuDS must not be constructed in contaminated ground as they have the potential to provide a pathway for pollutants. Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be installed, should site conditions allow. Evidence of pollution mitigation supplied must be demonstrated.</p>	

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M232	184	New para to be inserted after 21.55 ²¹	<p>Development proposals should be mindful of proximity to wastewater infrastructure facilities such as pumping stations and water recycling centres due to the presence of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of essential infrastructure.</p>	Agreed in the Anglian Water SoCG
M233	184	21.57	<p>Industrial development may give rise to pollution to land and water, and/or result in disturbance to habitat sites. Due to the limited scale of industrial development, proposed studies have not focused on the impacts of this type of development in the Borough. These will be dealt with on a case-by-case basis in order to ensure that activities do not have an adverse impact on the environment or residential amenity. In particular, the implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface water do not result in the contamination of land, ground water or local water courses nearby, or further afield, or result in adverse impacts to human health and residential amenity.</p>	In response to the Environment Agency's comments

²¹ Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M234	185	21.62	<p>Contaminated land could be created as a result of uses such as petrol stations, car washes, sites used for industrial and commercial storage, and agriculture due to pollutants produced by the previous or existing site uses. It is important to ensure pollutants do not harm the health of the public or environment and that future development does not exacerbate these issues. Developers should follow the risk management framework provided in '<u>Land Contamination: Risk Management</u>', when dealing with land affected by contamination. The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.</p>	<p>In response to the Environment Agency's comments</p>
M235	187	Policy SD9 – Water Supply and Waste Water	<ol style="list-style-type: none"> <li data-bbox="765 933 1450 1192">1. All new residential development will be required to achieve a water efficiency standard of 85 90 litres per person per day of mains supplied water/potable water Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply. <li data-bbox="765 1192 1450 1368">2. All non-residential development should achieve full credits for Wat 01 of BREEAM. New, extended or redeveloped non-household ('non-household' means all development except residential) 	<p>Agreed with ECC, Natural England, Anglian Water and Esses & Suffolk Water through SoCG.</p>

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
			<p>dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</p>	
M236	187	Policy SD9 – Water Supply and Waste Water. New criteria to be added.	<p>5. A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:</p> <p class="list-item-l1">a) Baseline information relating to existing water use within a development site; and</p> <p class="list-item-l1">b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings,</p>	As agreed with Essex County Council and Natural England in SoCG

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			rainwater/stormwater harvesting and reuse, or greywater recycling).	
M237	187	Para 21.70 The fittings approach is where water fittings and appliances are selected which have a capacity up to the maximum flow rate only.	As agreed with Essex County Council in SoCG
M238	187	New para to be inserted after 21.70 ²²	The <u>Shared Standards in Water Efficiency for Local Plans (June 2025)</u> set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, to provide advice and evidence to Local Planning Authorities (LPAs) on how they can secure higher water efficiency standards for new homes and commercial developments.	Agreed with ECC and Natural England through both SoCG. Broadly reflective of text in Anglian Water and Essex & Suffolk Water SoCGs.
M239	191	Monitoring Framework – Objective 6 – Monitoring Indicator	Number of Whole Life Cycle Carbon Assessments submitted meeting all targets Number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets	As agreed with Essex County Council in SoCG
M240	191	Monitoring Framework – Objective 7 –	Percentage of residential developments achieving water efficiency standard of no more than 85 90 litres per person per day	To reflect MM XX to Policy SD9

²² Please note renumbering of paragraphs in this chapter will be required as a result of this modification

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		Monitoring Indicator		
M241	192	Monitoring Framework – Objective 12 – Policies	B1 – South Benfleet Town Centre Ensuring the Vitality of Town Centres and Supporting Local Retail Centres Services (Policies TC1 to TC5)	To include correct policy references
M242	192	Monitoring Framework - Objective 13 and 15 - Policies	Ensuring the Vitality of Town Centres and Supporting Local Retail Centres Services (Policies TC1 to TC5)	To include correct policy references
M243	192	Monitoring Framework - Objective 18 - Objective	Provide well designed homes that meet local needs in terms of quantity, affordability, care, support and accessibility and any accessibility requirements	To reflect MM XX to Objective 18
M244	192	Monitoring Framework - Objective 16 and 18 – Policies	SP3 – Meeting Development Needs Hou1 – Housing Supply Hou32 – Securing More Affordable Housing Hou54 – Specialist Housing Requirements Hou76 – Gypsy and Traveller Provision	To include correct policy references
M245	192	Monitoring Framework - Objective 16 and 18 –	Annual Specific Housing Needs Completions % of all new homes built to standard M4(3)	As agreed with Essex County Council in SoCG

Ref	Page of submitted Castle Point Plan	Policy/ Paragraph	Main Modification	Reason/Justification
		Monitoring Indicator	Annual delivery of retirement, sheltered homes Annual delivery of extra care units	
M246	193	Monitoring Framework Objective 19 - Objective	Secure improved health and wellbeing outcomes for residents enabling more active and healthier lifestyles, creating healthy Living environments and reducing health inequalities ensuring inclusive communities	To reflect MM XX to Objective 19
M247	193	Monitoring Framework Objective 19 – Monitoring Indicator	Submission Percentage of Health Impact Assessments submitted for relevant applications	As agreed with Southend-on-Sea Council in SoCG
M248	193	Monitoring Framework Objective 19 – Monitoring Indicator	Submission of Health Impact Assessments Number of Health Impact Assessments submitted in accordance with Policy Infra3 Number of Health Impact Assessment for Hot Food Takeaway Applications in accordance with Policy TC5 Number of Hot Food Takeaway Applications refused in accordance with Policy TC5	As agreed with Essex County Council in SoCG
M249	193	Monitoring Framework	Infra 5 – Indoor Leisure and Sports Sports Provision	To include correct policy references

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
		Objective 20 – Policies		
M250	193	Monitoring Framework Objective 20 – Monitoring Indicator	Number of new community use agreements per year	As agreed with Southend-on-Sea Council in SoCG
PM1	194	Policies Map	Update to reflect modifications set out in separate table for Policies Map.	See separate table regarding Policies Map.
M251	195	Glossary	Community Facilities: Are buildings, which enable a variety or local activity to take place including, but not limited to, the following: <ul style="list-style-type: none"> • Schools, Colleges and other educational facilities • Libraries and community centres.... 	As agreed with Essex County Council in SoCG
M252	198	Glossary	SANG (Suitable Alternative Natural Greenspace) – A strategically planned high quality semi-natural green space designed to draw recreational visitors away from ecologically sensitive protected sites such as SPAs (Special Protection Areas), thereby reducing development impacts. SANGs may include green or blue infrastructure and serve a multi-functional role, for example: provision of SuDS, climate change mitigation and enhancing public health and wellbeing.	As agreed in NE SoCG

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
M253	200-202	Appendix B – Superseded Policies	Various updates – see separate appendix below.	The table has been updated to clarify all saved policies from the Adopted Local Plan 1998 will be superseded by the Castle Point Plan.
M254	203	Appendix C – Green Belt	Map to be updated to take account of modifications required to the Green Belt boundary as set out in the Policies Map table below.	See separate table regarding Policies Map.
M255	206/207	Appendix F – Town Centre and Primary Shopping Areas Maps (Policy TC1)	Each map to include a key to identify purple area are the town centres and blue dashed lines are shopping parades.	Consistency and clarity to enable the map to be fully understood
M256	208	Appendix G – Local Shopping Parades List (Policy TC2)	Update to amend inconsistencies with Policies Map <ul data-bbox="826 949 1455 1384" style="list-style-type: none"> • Benfleet 1: Remove '312-', so it simply says '322 London Road (Evens)' • Canvey Parade 4: Remove reference to 3 Denham Road • Canvey 6: Should say 6-12, rather than 8-12 • Canvey 7a: Remove reference to 270-276 (even numbers) • Canvey 7b: Add 270-272 (Even numbers) to description • Thundersley 1: Amend 61-83 to say 61-85 	To more accurately align with Policies Map and Policy TC2. There are now 21 parades in the Appendix as set out in Policy TC2, with Canvey 10 being included.

Ref	Page of submitted Castle Point Plan	Policy/Paragraph	Main Modification	Reason/Justification
			<ul style="list-style-type: none"> • Add Canvey Island Parade 10 'Canvey Esplanade' 1-37 Eastern Esplanade 	
M257	209	Appendix H – Heritage Assets List (Policy D9)	<p>The tables below identifies identify the designated and non-designated heritage assets as set out in Policy D9 as of July 2025. Note that this list may change over time as new non-designated heritage assets are identified or as designations are updated.</p>	Responding to Historic England comments
M258	214-217	Appendix J – Local Open Spaces List (Policy Infra4)	Remove reference to school playing fields	As agreed with Essex County Council in SoCG
M259	Inside back cover	Inside back cover	Add Ordnance Survey accreditation for all maps within the Castle Point Plan, alongside existing credits.	Omitted in error.

Policies Map

Ref	Policy	Main Modification	Reason/Justification
PM2	General	Add a north arrow, scale bar and OS copyright to the Policies Map	Omitted in error
PM3	General	Address styling issues where multiple layers are overlapping causing difficulty in readability.	Consistency and clarity to enable the map to be fully understood
PM4	General	Add Mineral Safeguarding Areas to Policy Map	As agreed with Essex County Council in SoCG
PM5	Policy SP1 – Supporting Enhancement of the Borough's Green Spaces and Policy Infra 4 – Open Spaces	Remove area of Ancient Woodland outside of the Castle Point Boundary (Kingley Wood) as this is within Rochford District Remove school playing fields from open space designation	Factual correction As agreed with Essex County Council in SoCG
PM6	Policy C3 – Canvey Port Related Facilities a	Update northern boundary of the 'Port Related Facilities' area to match the 'on the ground' boundary of those facilities and to remove overlap with South Canvey Green Lung.	In response to comments from Oikos
PM7	Policy C6 – The South Canvey Green Lung	'Green Lung' boundary to be reduced in accordance with Anglian Water operational land/land ownership mapping, as illustrated below:	Agreed with Anglian Water in SoCG

Ref	Policy	Main Modification	Reason/Justification
			
PM8	Policy C7 – Canvey Lake	Add 'Canvey Lake' to Policies Map	Omitted in error
PM9	Policy Hou6 – Gypsy and Traveller Provision	Update extent of 'Janda Fields and Orchard Place Gypsy and Traveller Sites' to align with planning permission and not the area that is tolerated	Factual correction to align with existing planning permissions
PM10	Policy E1 – Development on Strategic Employment Land	Add 'Rayleigh Employment Designation' to Policies Map	Omitted in error

Ref	Policy	Main Modification	Reason/Justification
PM11	Policy TC2 – Local Shopping Parades	<p>Update 'Shopping Parades' to reflect inconsistencies with Appendix G.</p> <ul style="list-style-type: none"> Canvey Parade 4 Denham Parade: 174-176 Long Road (Ladbrokes) and Wong Hing Chinese Takeaway need to be added (include car parking). Also, 2 Denham Road (MSB House) is misdrawn and needs correcting, it is missing ADB Accountancy and only includes the western half of the building. Hadleigh Parade 1 Woodfield Road: Remove numbers 85-91 from the Parade, which are residential addresses. Benfleet Parade 1 London Road j/w Kents Hill Road: Sections south of the junction 322 London Road needs to be added. Thundersley Centre: Remove pavement frontage of Aston Place <p>Several minor drawing issues, e.g. need for snapped boundaries and consistency around amenity areas.</p> <ul style="list-style-type: none"> Benfleet Parade4: 42 High Street drawn inaccurately. Canvey Parade 4: 2 Craven Avenue is drawn inaccurately Canvey 7b, 8 and 9 are drawn inaccurately Thundersley 2: Needs presenting as a single area shape, rather than the two cojoined shapes Thundersley 3: Drawn inconsistently, need to include adjacent pavements and grassed verge fronting Kiln Road 	Factual corrections and minor drawing issues to ensure alignment with OS base map.
PM12	Policy Infra2 – Education, Skills and Learning	Add existing 'Educational Establishments' to the Policies Map	As agreed with Essex County Council in SoCG

Appendix 1

The table below sets out the modifications proposed to Appendix B – Superseded Policies.

Saved policies 2007		Relevant policies in the new Local Plan
Green Belt		
GB2 – Re-use of buildings in the Green Belt		GB1, GB2
GB4 – Rebuilding of existing dwellings in the Green Belt		GB1, GB2
GB5 – Extensions to dwellings		GB1, GB2
GB6 – Garden extensions		GB1
GB7 – Agricultural dwellings		GB1, GB2
Environment and conservation		
EC2 - Design		D1, D2, D3, D4
EC3 – Residential amenity		D1, SD6
EC4 - Pollution		SD6
EC5 – Crime prevention		D1
EC7 – Natural and semi-natural features in urban areas		ENV1, D4
EC8 – The green lung		C6
EC9 – Development affecting commercial farmland		ENV6

Saved policies 2007		Relevant policies in the new Local Plan
EC10 – Protection of high quality agricultural land		ENV6
EC13 – Protection of wildlife and their habitats		ENV3
EC14 – Creation of new wildlife habitats		SP1, ENV3
EC15 – Control of permitted development in sensitive areas		ENV1, ENV3, ENV4
EC16 – Protection of landscape		ENV1
EC17 – Special landscape area		Had2
EC18 – Permitted development in the special landscape area		Had2
EC19 – Ancient landscapes		C4, DH1
EC20 – Landscape improvement area		ENV1
EC21 – Woodland management and tree preservation orders		ENV3

Saved policies 2007	Relevant policies in the new Local Plan
EC22 – Retention of trees, woodland and hedgerows	ENV3, D4
EC23 – Tree and shrub planting	D4
EC25 – Principles of control	D9
EC26 – Design and development	D9 and South Benfleet Conservation Area Design Code
EC27 – Planning applications	D9
EC28 – Restrictions on permitted development	D9
EC29 – Control of demolition	D9
EC30 – Shopfront design	D7
EC31 - Advertisements	D5
EC32 – Protection from demolition	D9
EC33 – Alterations to listed buildings	D9
EC34 – Setting of listed buildings	D9
EC35 – Re-use of listed buildings	D9
EC36 – Grant aid	D9
EC37 – Local list of buildings	D9 and Appendix H

Saved policies 2007	Relevant policies in the new Local Plan
EC38 – Archaeological sites and monuments	D9
EC39 – Seafront entertainment area	C2
Housing	
H2 – Residential land	Hou1
H3 – New development sites	C2, C4, C9, C10, B3, B5, B6, B7, B8, Had3, Had4, Thun2, Thun3
H4 – Safeguarding of land for long term housing needs	HOU5, C8
H5 – Safeguarding of land for long term housing needs	SP2
H6 – Safeguarding of land for long term housing needs	Had4
H7 – Affordable housing	Hou2
H9 – New housing densities	SP2
H10 – Mix of development	Hou3
H11 – Accessible and wheelchair housing	Hou4
H12 – Piecemeal development	SP4
H13 – Location of development	SP2, SP3
H14 – Living over the shop	TC1
H16 – Winter gardens	T3

Saved policies 2007		Relevant policies in the new Local Plan
H17 – Housing development – design and layout		D1, D2
Employment		
ED1 – Provision of land to the south of Northwick Road		C4
ED2 – Long term employment needs		C4
ED3 – Protection of employment areas		E1
ED5 – Piecemeal development		E1
ED6 – Parking and servicing		T7, T8
ED7 – Environmental improvements		E1
ED9 – Hazardous installations		C3, SD8
Shopping		
S1 – Location of retail development		TC1, TC2, TC3
S2 – Shopping facilities at Rayleigh Weir		TC3
S3 – Primary shopping frontages		TC1
S4 – Non-retail development		TC1, TC2, TC3, E2
S5 – Parking and servicing		T7, T8

Saved policies 2007		Relevant policies in the new Local Plan
S7 – Environmental improvements		TC1, C1, B1, B2, Had1
S9 – Local shopping parades		TC2
S10 – Supermarket and retail warehouse development		TC1, TC3
S12 – Design, siting and illumination of advertisements		D5
S13 – Proliferation of advertisements		D5
S14 – Advertisements and public safety		D5
S15 – Hoardings and poster panels		D5
Transport		
T1 – Strategic highway network		T1
T2 – Intensification of access use		T5
T5 – New link road access to employment land		C5
T6 – Access to employment land		C5
T7 – Unmade roads		T5
T8 – Car parking standards		T7

Saved policies 2007		Relevant policies in the new Local Plan
T10 - Cycleways		T3
T11 – Cycleway construction		T3
T12 – Bus services		T4
T15 – Water-borne freight		C3
Recreation		
RE2 – Golf courses		SP1
RE4 – Provision of children's play space and parks		Infra4
RE5 – Public open space		Infra4
RE6 - Allotments		Infra4
RE7 – Romsey Road allotments		Infra4
RE8 – Hadleigh Castle Country Park		Infra4, Had2
RE9 – Informal recreation in the countryside		SP1, Infra4, GB1
RE10 – Water recreation		Infra4
RE12 – Public rights of way		T3
RE14 – Planning agreements and recreational development		SP4, Infra4

Saved policies 2007		Relevant policies in the new Local Plan
Community facilities		
CF1 – Social and physical infrastructure and new developments		Infra1
CF2 – Education facilities		Infra2
CF4 – Workplace nurseries		Infra1
CF6 – Places of worship and community centres		Infra1
CF7 – Health facilities		Infra3
CF8 – Non-residential health care		Infra3
CF9 – Access and non-domestic development		D1
CF12 – Powerlines and cables		Infra6
CF13 – Phasing of development		SP4
CF14 – Surface water disposal		SP4, SD3
CF15 – Water supply		SP4, SD7
CF16 - Telecommunications		Infra6
CF17 – Waste recycling		T8