



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Draft**

Between

Castle Point Borough Council

and

Essex & Suffolk Water

December 2025

## **1. Introduction**

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Essex & Suffolk Water in relation to the Castle Point Local Plan (known as the Castle Point Plan).
- 1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.
- 1.3 CPBC has fully engaged with Essex & Suffolk Water on the development of the Castle Point Plan from the outset with regards its role as statutory consultee.
- 1.4 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, Essex & Suffolk Water has been formally consulted at Regulation 18 and 19 stages of consultation.
- 1.5 This SoCG identifies the matters on which CPBC and Essex & Suffolk Water are agreed, as well as any areas where differences remain.

## **2. Strategic Matters**

- 2.1 Essex & Suffolk Water and CPBC agree and work collaboratively on Castle Point Plan policies SP3, SD9 and employment land policies

## **3. Areas of Agreement (Common Ground)**

- 3.1 Essex & Suffolk Water submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (August to September 2025) on 25<sup>th</sup> September 2025. Essex & Suffolk Water confirmed their position during the further consultation (October to December 2025).
- 3.2 Essex & Suffolk Water welcomes the overall content and vision of the Local Plan and commend the Council on reaching this detailed stage of development. Both parties acknowledge the importance of water resources, supply and demand forecasting and water efficiency and look forward to future engagement as the Castle Point Local Plan progresses.
- 3.3 The entries in the table below set out the agreed modifications to the Castle Point Plan, which therefore resolve all of the representations from Essex & Suffolk Water. All of the modifications in this SoCG have been included in the Council's Schedule of Modifications

<b>Rep Number</b>	<b>Policy/Paragraph Reference</b>	<b>Summary of Representation/comment from Essex &amp; Suffolk Water</b>	<b>Agreed response and modifications</b>
0339	General Comment	Essex & Suffolk Water's published Water Resources Management Plan 2024 (WRMP24) shows that forecasted Essex WRZ supply demand balance surplus is less than 10Mld until 2029, and no more than 26 Mld until 2035. This forecast does not include the increase in domestic water supply required as a result of the NPPF Government five-year housing plan published in November 2024.	Forecasted figures noted as a factor in forward planning.
0339	General Comment	Water scarcity is a significant issue in Essex with our full supply area being classified as a serious Water Stressed Area. Consequently, it is important that future development is designed to be water efficient and aligned to national targets for reducing per capita consumption and business demand.	Agreed aim that that future development is designed to be water efficient and aligned to national targets for reducing per capita consumption and business demand.
0339	Castle Point Infrastructure Delivery Plan	As noted in the Infrastructure Delivery Plan (paragraph 10.20.2) as part of the evidence for your local plan, Essex & Suffolk Water has identified infrastructure improvements that will be needed to accommodate the proposed levels of growth across our operating area. These improvements include mains rehabilitation works, water main reinforcements and duplications to ensure supply is maintained. We strongly encourage the submission of pre planning enquiries to Essex & Suffolk Water (ESW) as this will help planning changes as efficiently and effectively as practicable.	Noted.

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0339	Policy SP3 Meeting development Needs.	<p>The housing requirement set out in Policy SP3 is stepped, with a minimum of 209 new homes per year for the years 2026-31 (years 1 to 5), increasing to 253 new homes per year for 2031-2036 (years 6-10) and at least 554 homes per year from 2036-43 (years 11 to 17). We note most of the housing allocation sites are within Canvey, Benfleet, Hadleigh and Thundersley.</p> <p>In terms of water supply, water companies have a statutory obligation to meet and supply all domestic demands but are not statutory consultees on planning applications. In accordance with our legal obligations, we will provide connections to our network for all housing developments but would welcome further discussion with you regarding build profiles and timings so that we can plan this work as efficiently as possible.</p> <p>To ensure we have a sufficient lead-in time to address any potential water supply issues ahead of planning permission being granted, for both employment land or housing provision, we strongly encourage developers to submit a pre-planning enquiry to Essex &amp; Suffolk Water (ESW) (<a href="http://www.eswater.co.uk/developers/large-developer/pre-planning-enquiry">www.eswater.co.uk/developers/large-developer/pre-planning-enquiry</a>). We would be grateful if this could be made a requirement of</p>	<p>Build profiles and timings will be subject to confirmation at Plan adoption and monitored via the Annual Monitoring report (AMR) and housing land supply monitoring (see <a href="#">Housing Topic Paper</a>), which are publicly available.</p> <p>Whilst Councils can encourage pre-application discussions, it is an optional, discretionary service and cannot be made a requirement.</p> <p>The constraints derived from unaligned geographic boundaries and of unaligned business and spatial planning timescales are noted.</p>

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		<p>your planning process. This will allow us to assess the proposals and provide timely feedback before applications are formally submitted and considered by the planning authority.</p> <p>It is important to reiterate that Essex &amp; Suffolk Water considers all applications across our entire operating area carefully, covering several councils and many varied development plans. Please be aware that ESW water supply area boundaries will not necessarily align with that of any council's and the positioning and volume requirements of any connection new to our water network will impact on the costs associated. Similarly, the timing of any council's planning is unlikely to coincide with the timing of our own business planning, and we must be considerate to all our regulators.</p>	
0339	Caravan Parks (element of Policy SP3 and relationship to Policy SD9	We note that the replacement of old caravans at Thorney Bay Caravan Park does not need planning consent but does contribute to housing supply. Over the Plan period it is expected that a total of 173 park homes will replace existing caravans at this site. It is not clear whether they are obliged to conform to policy SD9, and so we would ask the council to ensure all new caravans, including those on all sites in the Borough, meet water efficiency standards set out in Policy SD9	Park homes are generally exempt from UK Building Regulations (including Part G water efficiency standards) because they are considered a type of mobile, transportable dwelling. Instead of the Building Regulations, new park homes intended for permanent residential use must comply with the British Standard <b>BS 3632 which</b> promotes water efficiency through requirements for specific types of plumbing systems and water-using appliances, it does

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			<p>not use the same quantifiable l/p/d target or the same regulatory framework as Part G of the Building Regulations.</p> <p>The Council will encourage compliance with relevant water efficiency standards as far as possible.</p>
0339	Policy SD9 Water Supply and Waste Water.	<p>We welcome Policy SD9 Water Supply and Waste Water.</p> <p>While we acknowledge that this policy states that all new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day (PCC), we wish to formally draw your attention to the recently published regional shared standards for water efficiency in local plans, Shared Standards in Water Efficiency for Local Plans.</p> <p>The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Essex &amp; Suffolk Water, Cambridge Water, Essex &amp; Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a</p>	<p>CPBC have commissioned consultants to prepare a Water Capacity Assessment. This work is programmed from completion in Q1 2026. CPBC will continue to keep NE informed of this additional work. This will supplement the Shared Standards for Water Efficiency in Local Plans.</p> <p>Suggested Modification to Policy SD9:</p> <ol style="list-style-type: none"> <li>1. All new residential development will be required to achieve a water efficiency standard of <b>85 90-litres per person per day of mains supplied water/potable water per person per day</b>. <del>Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the</del></li> </ol>

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		<p>clean and sustainable supply of water - essential for growth and nature recovery.</p> <p>The Shared Standards recommend that LPAs include Local Plan Policies that:</p> <ul style="list-style-type: none"> <li>• Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible.</li> <li>• Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator.</li> <li>• Require new major non-domestic developments to include water saving measures and water reuse in their design.</li> </ul> <p>These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by</p>	<p><del>Building Regulations will apply.</del></p> <p>2. <del>All non-residential development should achieve full credits for Wat 01 of BREEAM.</del> <b>New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREEAM 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 BREEAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</b></p> <p>A new paragraph to be added to the reasoned justification:</p>

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		<p>setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. At present it is feasible to achieve a total consumption of 85 litres/person/day by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost.</p> <p>These standards aim to drive meaningful progress in water efficiency. Achieving this enhanced level of performance not only contributes to environmental sustainability but also strengthens the resilience of future developments in the face of growing pressures on water resources, driven by climate change and population growth.</p> <p>Whilst we recognize that an 85 litres/person/day PCC target, explained in the shared standards, may be challenging, we expect it to be very achievable within the timeframe of this plan and so we will be encouraging this target through our financial reward scheme of environmental incentives for developers. These are tied into Company Business Plans that are published every five years with the latest being published in 2025.</p> <p>Policy SD9 will support sustainable growth in Castle Point by promoting greater water efficiency in new developments, while longer-</p>	<p><b>The Shared Standards in Water Efficiency for Local Plans (June 2025) are developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East 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.</b></p>

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		<p>term water supply solutions are planned and delivered. Water efficient new development means demands will be less than otherwise would be the case, which in turn means the quantity of water we need to abstract from the environment is also less. This supports national objectives for sustainable abstraction as set out in the National Framework for Water Resources 2025.</p>	
0339	Employment Need and Employment Land	<p>We are fully committed to supporting economic growth across the region and in the Borough of Castle Point and continue to invest in infrastructure enhancements to improve water distribution. However, it is important to note that, unlike domestic supplies, we do not have the same statutory obligation to provide water for non-domestic purposes and may be unable to immediately do so if the new water requirement is greater than the residual capacity in our network. We therefore have a particular interest in proposed strategic employment and economic development within your administrative area so that we can plan timely investment to increase capacity should it be needed.</p> <p>Policy B8 Manor Trading Estate and Policy C4 West Canvey explain that the regeneration and renewal of their respective areas will be carried out through a master plan approach.</p>	<p>Throughout the Castle Point Plan, the need to collaborate with a range of stakeholders to ensure delivery of development is highlighted. Paragraph 16.38 identifies that through the master plan process, infrastructure providers will be engaged, however it is agreed this could be clarified further through Policy D3.</p> <p>Policy D3 - Master Planning  1. Where this Plan requires the use of Master Plans for allocated sites, these will be approved by the Council in advance of the determination of any planning application. Where sites are in multiple ownership this will ensure that any individual parcels will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the site allocation or wider area. 2. In preparing the Master Plan, the Council requires the</p>

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		<p>Policy E1 Development on Strategic Development Land states that the council will seek to provide and maintain classes B2 and B8 and another suitable Class B uses.</p> <p>We are keen to work collaboratively with the Local Authority's Economic Development and Planning teams to gain a detailed understanding of the nature of the proposed development. The development is expected to fall broadly within Use Classes B2, B8, and other Class B categories which can encompass a wide range of commercial activities with significantly varying water supply requirements. We are currently updating our policy position on large non-household developments requiring significant mains water for non-domestic use including but not limited to data centres, giga factories and hydrogen production plants.</p> <p>However, we can confirm that we will not approve new mains water connections to data centres where the water will be used for open loop cooling systems as we consider this to be an unsustainable use of water. However, we will consider supplies for closed loop cooling systems on a case-by-case basis through our pre-planning enquiry process.</p> <p>We note that both sites are intended to come forward later in the Plan period, and it is imperative to work collaboratively regarding the</p>	<p>applicant to demonstrate how they have engaged with and sought the views of relevant landowner(s), key stakeholders, <b>infrastructure providers</b> and the local community.</p> <p>Whilst Councils can encourage pre-application discussions, it is an optional, discretionary service and cannot be made a requirement.</p>

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		<p>anticipated timing and phasing of the development and for us to fully understand the nature of the development. Again, we strongly encourage the submission of pre-planning enquiries to Essex &amp; Suffolk Water (ESW) so we can ascertain the water supply needs, and plan and deliver in a timely manner any necessary infrastructure that may be needed. We also understand that, in the early stages of the Plan period, industrial use displaced by the redevelopment of sites for residential or town center purposes may be relocated to designated employment areas. Considering this, we request to be consulted at the earliest opportunity so that we can assess any associated infrastructure requirements in a timely manner.</p>	

#### **4. Areas Without Agreement (Uncommon Ground)**

4.1 There are no areas without agreement.

#### **5. Ongoing Cooperation**

5.1 CPBC will continue to work cooperatively with Essex & Suffolk Water throughout the examination of the Castle Point Plan and through the latter body's functions as both a statutory undertaker in the provision of water supply services and in being a statutory consultee for plan making and planning applications.

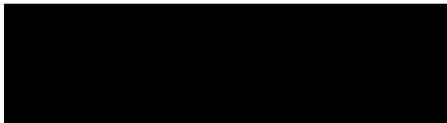
## Signatories



For and on behalf of Castle Point Borough Council:

**Name and Position: Ian Butt – Director of Place and Communities**

**Date:** 12 December 2025



For and on behalf of Essex & Suffolk Water

**Name and Position:** Sarah Bowemran, Local Authority Liaison Officer

**Date:** 09/12/2025