



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Pre-Submission Draft**

Between

Castle Point Borough Council

and

Natural England

January 2026

## **1. Introduction**

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Natural England (NE) 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 (PPG).
- 1.3 CPBC has fully engaged with NE 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, NE has been formally consulted at Regulation 18 and 19 stages of consultation together with its accompanying Sustainability Appraisal/Strategic Environmental Assessment.
- 1.5 This SoCG identifies the matters on which CPBC and NE are agreed, as well as any areas where differences remain.

## **2. Strategic Matters**

- 2.1 NE and CPBC agree to work collaboratively and on an ongoing basis with regards to Local Plan policies, implementation of site allocations, masterplans, green infrastructure, biodiversity net gain, habitats regulation assessments and protection and enhancement of international and sites, protection and enhancement of statutory and non-statutory designated sites, protection and enhancement of priority habitats and species, flood protection measures, landscape assessments and open space provision. Some of this engagement will be through meetings at sub-regional level on matters such as the Recreation Area Mitigation Strategy (RAMS) and the revisions to the tariff.

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

- 3.1 NE submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (August to September 2025) on 10<sup>th</sup> October 2025, having agreed a short extension of time. Natural England confirmed their position during the further consultation (October to December 2025) on 25<sup>th</sup> September 2025.

3.2 NE supports the direction and aims of several key policies and principles, as follows:

Strategic Policy SP4 - Development Contributions	NE welcomes the inclusion of green and blue infrastructure (GI) in this policy.
Policy C1 - Canvey Town Centre	NE is pleased to see reference to Essex Local Nature Recovery Strategy (LNRS) in this and other place-based policies.
Policy C3 - Canvey Port Facilities	Natural England notes the potential for development or redevelopment of the facilities at this site and are pleased that Castle Point recognise the importance of ensuring any proposals of this nature must be in line with relevant nature conservation legislation to avoid impacting any nearby protected sites.
Place-based policies DH1, Thun4 and C6	NE welcomes the place-based policies focused on protecting important areas of greenspace and their connectivity across the district, e.g. Daws Heath (DH1), Thundersley (Thun4) and the Green Lung (C6). We support the general aims of these policies to improve the connectivity and condition of the GI network and its habitats, and address deficiencies in access to greenspace.
Policy C6	NE supports policy C6 to protect the South Canvey Green Lung as an important asset for people and nature, and its aims to align with the Essex LNRS and seek opportunities to create new habitat (e.g. through BNG) wherever possible.
Policy Thun 4 – Green Space Connectivity in Thundersley	NE is pleased to see reference to 'projects to promote the continued improvement of the local wildlife sites and Thundersley Great Common SSSI and recovery of its currently unfavourable condition'.
Policy DH1 – Green Space Connectivity in Daws Heath	NE is pleased to see reference to 'projects to promote the continued improvement of the local wildlife sites and SSSIs (Garrold's Meadow and Great Wood and

Dodd's Grove) and recovery of sections that are in an unfavourable condition'.

**Policy ENV2 – Coastal & Riverside Strategy**

Natural England welcomes the strategic approach set out in Policy ENV2 with regards to coastal management and will review the Riverside Strategy HRA when this is available. We would encourage Castle Point to explore potential nature-based solutions to coastal and flood management as these can create opportunities for environmental enhancement that may help to mitigate any potential impacts on protected sites or act as compensatory measures should these be required.

**Policy ENV6 – Best and Most Versatile Agricultural Land**

NE supports the protection of best and most versatile agricultural land.

3.3 The entries overleaf set out the agreed modifications to the Castle Point Plan, which resolve the majority of Natural England's representations. All modifications in this SoCG are also included in the Council's Schedule of Modifications.

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
0341	Vision & Objectives	<p>Natural England welcomes the reference to multi-functional green infrastructure (GI) in the Vision but advise that the protection of existing nature conservation sites and adherence to nature recovery priorities should be included.</p> <p>Natural England supports objectives 2, 3 and 4 relating to multi-functional GI and biodiversity networks but we strongly advise including an objective to protect and enhance nature conservation sites.</p>	<p><u>Addition to Vision point 3 as follows:</u></p> <ul style="list-style-type: none"> <li><b>Natural assets are protected and nature recovery is prioritised.</b> 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.</li> </ul>
0341	Policy SP1– Supporting Enhancement of the Borough’s Green Spaces	<p>Natural England welcomes the support for the delivery of the Essex Local Nature Recovery Strategy (LNRS) and the new opportunities to deliver multi-functional GI and wider benefits. However, please note that</p>	<p><u>Modification to Policy SP1</u></p> <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, <b>subject to sensitive consideration of environmental assets including internationally important coastal</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>protecting coastal areas to enable improved access will need to be delivered sensitively to ensure that the notified interest features of internationally important coastal sites are not adversely impacted by additional recreational pressure. We welcome the reference in the supporting text to the 'protection of Habitats Sites identified through international legislation' (6.13, 6.14).</p> <p>The management of any new and enhanced green infrastructure should be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Natural England recommends that green infrastructure delivered within (or associated with) major new developments</p>	<p><b>sites and ensuring they are not adversely impacted by recreational pressure.</b></p> <p><b>5. The management of any new and enhanced green infrastructure must be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Green infrastructure delivered within (or associated with) major new developments should be managed, maintained and monitored for a minimum of 30 years in accordance with Natural England's GI Strategy Standard.</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>should be managed, maintained and monitored for a minimum of 30 years[1]</p> <p>[1] See: Natural England's Green Infrastructure Framework: GI Strategy Standard</p>	
0341	Policy SP2 - Making Efficient Use of Urban Land and Creating Sustainable Places	<p>Please note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy.</p>	<p><u>Modification to Policy SP2</u></p> <p>3d. Support integrated access to public open space, and the enhancement of the multi-functional green infrastructure network <b>and biodiversity</b> to offer a range of health, and environmental benefits;</p> <p><u>Modification to Reasoned Justification</u></p> <p>6.30 As the density of the urban areas increases within the Borough, the need to protect and enhance access <b>and existing environmental assets</b> to make the best use of local open spaces <b>and protect urban biodiversity</b> 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.</p>
0341	Policy SP3 – Meeting	6.47 A Habitats Regulations Assessment will be required for	<u>Modification to Reasoned Justification</u>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
	Development Needs	<p>windfall sites on Canvey Island at application stage in order to demonstrate no adverse effects on site integrity – we consider that this could be worded more clearly as follows: ‘A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage <b>and will need to</b> <del>in order to</del> demonstrate no adverse effects on site integrity <b>before development can be granted permission</b>’. We advise replacing the former sentence with this wording wherever it occurs throughout the document under different locations.</p>	<p>6.47 A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity <b>before development can be granted permission</b>.</p> <p>8.16 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity <b>before development can be granted permission</b>.</p> <p>8.26 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity <b>before development can be granted permission</b>.</p> <p>8.40 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 <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse impacts on the integrity of nearby habitats sites or functionally linked land <b>before development can be granted permission</b>.</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p>8.72 .....A Habitats Regulations Assessment will be required of development proposals <del>to avoid any and will need to demonstrate no</del> adverse effects on the integrity of nearby Habitats sites including from construction impacts as well as occupational impacts, <b>before development can be granted permission.</b></p> <p>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 <del>to avoid any and will need to demonstrate no</del> adverse effect on the integrity of nearby Habitats sites or functionally linked land, <b>before development can be granted permission.</b></p> <p>9.23 A Habitats Regulations Assessment will be required of development proposals at B7A: Richmond Avenue Car Park <del>to avoid any and will need to demonstrate no</del> adverse effect on the integrity of nearby Habitats sites or functionally linked land, <b>before development can be granted permission.</b></p> <p>11.17 A Habitats Regulations Assessment will be required at application stage <del>in order to and will need to</del> demonstrate no adverse effects on sites integrity, <b>before development can be granted permission.</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p>13.46 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on sites integrity <b>before development can be granted permission.</b></p> <p>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 <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effects on integrity of nearby Habitats sites or functionally linked land <b>before development can be granted permission.</b></p> <p>14.49 A Habitats Regulations Assessment will be required of any project aimed at attracting large visitor numbers Centre <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effects on the integrity of nearby Habitats sites or functionally linked land <b>before development can be granted permission.</b></p> <p>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) <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effect on the integrity of nearby Habitats sites <b>before development can be granted permission.</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p>17.26 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) at application stage, <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effect on the integrity of nearby Habitats sites <b>before development can be granted permission.</b></p> <p>18.16 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 subject to a Habitats Regulations Assessment <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity. This will need to take into account the Castle Point Plan when considering in combination effects.</p> <p>19.56 A Habitats Regulations Assessment will be required at application stage for any facility near to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked land) <b>before development can be granted permission, in order to</b> <b>and will need to</b> demonstrate no adverse effects on site integrity.</p> <p>20.30 .....Any 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</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p>demonstrate no adverse effects on site integrity <b>before development can be granted permission.</b></p> <p>20.40 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity <b>before development can be granted permission.</b></p> <p>21.32 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 <b>before development can be granted permission.</b></p>
0341	Policy C4 - West Canvey	<p>8.39 states that 'development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents'. This will need careful consideration to ensure that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development. Please note that</p>	<p>8.39 ..... Furthermore, it is expected that the development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and <del>time in</del> nature opportunities for residents, <b>whilst ensuring that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development.</b></p> <p><u>Modifications to Policy:C4</u></p> <p><del>9. Appropriate links into multi-functional green infrastructure to the west of the site whilst avoiding adverse harm to biodiversity</del></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>assessments on SSSIs are separate considerations from impacts on international sites which are carried out under the Habitats Regulations as mentioned in 8.40.</p>	<p>through recreational impacts, or other impacts arising from urban development.</p> <p><b>9) Well-designed alternative SANG, to help alleviate pressure on the Essex Coast habitats</b></p> <p><b>10) A strategy that minimizes impacts upon the SSSI and does not impede LNRS aims of connectivity; via sensitive consideration of siting, buffers, lighting and noise. Residential development should be located with suitable buffers and in less sensitive parts of the site to avoid adverse impacts</b></p> <p><b>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.</b></p>
0341	Policy C5 - Improved Access to and around Canvey Island	<p>We suggest the following changes to the policy wording in point 4 as follows: 'Options in the feasibility study for improvements to access to</p>	<p><u>Modification</u></p> <p>4. Options in the feasibility study for improvements to access to Canvey Island will be subject to Habitats Regulations Assessment <del>that will need to demonstrate to ensure there is</del></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>Canvey Island will be subject to Habitats Regulations</p> <p><b>Assessment and will need to demonstrate to ensure there is no adverse effect on integrity to ensure there is no resulting harm to internationally protected sites'.</b></p>	<p>no adverse effect on integrity to ensure there is no resulting harm to internationally protected sites'.</p>
0341	Policy D3 – Masterplanning:	<p>Paragraph 16.38 states that masterplans should reflect the policy requirements of the Local Plan. In line with Policy SP1 and the wider Plan vision, this should include the need for multifunctional green infrastructure. The masterplan offers an opportunity to outline how GI has been integrated into a scheme to create high-quality, sustainable places. It will also ensure that GI is considered from the outset as an important piece of infrastructure in new developments.</p>	<p><u>Modifications</u></p> <p>16.38 The Council will work with those promoting development, the local communities and infrastructure providers to ensure that Master Plans accurately reflect <b>the vision</b> and the policy requirements in this Plan but also local aspirations and preferences concerning layout, style, character and relationship to adjoining land uses.</p> <p><b>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</b></p> <p>Note: subsequent paragraphs in the chapter will need re-numbering as a result of the addition.</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
0341	Policy ENV1 - Protecting and Enhancing the Landscape and Landscape Features	<p>We recommend including a reference to National Character Areas and Local Landscape Character Assessment areas (where datasets for these are available) Natural England - National Character Area Profiles - National Character Area Profiles.</p>	<p><u>Modification: New paragraph in Policy ENV1</u></p> <p><b>4. Development proposals should be designed to reflect character, features and priorities of established Landscape Character Areas and landscape assessments</b></p> <p><u>Modification: New Reasoned Justification Paragraph</u></p> <p><b>18.6 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 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</b></p>
0341	Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain	<p>We agree that 'Where appropriate, large scale residential developments within the Zones of Influence will be required to provide sustainable accessible natural greenspace (SANG) or SANG like provision'.</p>	<p><u>Modification: Addition to Policy ENV3 paragraph 1a and b</u></p> <p>a. Applying the principles related to the <del>biodiversity mitigation</del> hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy, <del>In Castle Point</del>, including ancient woodlands <del>are considered to constitute irreplaceable habitats</del></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>This should be defined as providing a minimum of 8Ha per 1000 new population of accessible semi-natural greenspace with a minimum 2.7km circular walk on-site or on-site and making use of the existing Public Rights of Way network. Note that the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) is in the process of being updated (section 18.23) and the supporting text should refer to future iterations of this strategy. We are pleased to see reference to SSSIs. Given point 1a covers irreplaceable habitats and SSSIs, should it refer to the mitigation hierarchy rather than the biodiversity hierarchy which prioritises steps for BNG delivery (onsite first, offsite, and</p>	<p>b. .... Where appropriate, large scale residential developments (<b>500 units + or equivalent</b>) within the Essex Coast Zone of Influence will be required to provide <b>sustainable Suitable Accessible Natural Greenspace (SANG)</b> or SANG-like provision. <b>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 existing greenspace (e.g. a Country Park) to SANG standard. and making use of the existing Public Rights of Way network.</b></p> <p><u>Modification: Paragraph 18.23</u></p> <p>18.23 A Recreational <del>d</del>Disturbance Avoidance and Mitigation Strategy (RAMS) has been prepared for <del>the Essex Coast Habitats Sites to address this</del> cooperatively across Essex. This, <b>together with any future updated iterations</b>, sets out a series of actions to be taken to avoid adverse <b>in-combination</b> effects upon <b>Essex Coast Habitats Sites</b> to <del>these habitats</del>. The Strategy identifies a Zone of Influence (ZOI) around each Habitats sites in Essex where recreational disturbance is likely to result from residential development.</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>statutory credits as a last resort)?</p> <p>We welcome point 1d(ii) and the 20% target for development on greenfield land. This aligns with the wider Essex ambitions for 20% Biodiversity Net Gain to support nature recovery and delivery of the LNRS.</p> <p>We welcome the inclusion of an Urban Greening Factor in the Plan. The UGF can work alongside BNG, ensuring that developments provide a biodiversity / greening uplift even where the BNG baseline is low. Public realm improvements (as noted in para 16.15) would also offer urban greening opportunities for Castle Point.</p>	<p>Modification: Merge Paragraph 18.24 into 18.23 together as they both address RAMs. This allows for the creation of a new paragraph 18.24 to address SANG (see below)</p> <p><b>New para: 18.24: The RAMS tariff addresses in-combination adverse effects on the integrity of the Essex Coast Habitats Sites. However, large sites (500+) with alone adverse effects from recreational disturbance will also need to 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.</b></p> <p><b>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 (add link to SANG guidelines on CPBC website). Where SANG or equivalent is provided, the RAMs tariff still applies, because in such cases, the Essex RAMS tariff mitigates for residual effect of these large sites, as no amount of on-site greenspace will prevent all visits to the coast, nor is that desirable.</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p><u>New addition to Glossary</u></p> <p><b>SANG (Suitable Alternative Natural Greenspace)</b> - 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.</p>
Policy C1 - Canvey Town Centre		Clarification to relevant site policy (necessary in light of above amendment to Policy ENV3 SANG policy).	<p><u>Modification to Policy C1(14)</u></p> <p>Policy C1(14). Development proposals must <b>satisfy the requirements of the habitats regulations</b> and must be designed to enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p>
Policy Thun2		Clarification to relevant site policy (necessary in light of above amendment to Policy ENV3 SANG policy).	<p><u>Modification to Policy Thun2(7)</u></p> <p>Policy Thun2(7). <b>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 enable and support</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
Policy SD1 - Tidal Flood Risk Management		<p>Natural England wishes to remind Castle Point that any flood risk projects which have the potential to impact SPA features will require an HRA to ensure that they do not damage designated features or impact SSSI species and habitats. We note the risks to biodiversity and ecology from climate change are identified in section 21.3 and welcome efforts to manage these impacts. Section 21.18 identifies the potential for intertidal marshland habitat loss that may require compensatory measures. Natural England would like to be consulted at the earliest stage to ensure that any compensatory measures are sufficient.</p> <p>We also encourage Castle Point to identify compensatory sites</p>	<p><u>Modification: Paragraph 21.18</u></p> <p>Local Plan 21.18 The loss of inter-tidal marshland habitats. The Benfleet and Southend Marshes is designated as a Special Protection Area (SPA) and is 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. <b>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.</b> 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>

<b>Rep Number</b>	<b>Local Plan Reference</b>	<b>Summary of representation/discussion</b>	<b>Agreed response and Reasoned Justification Changes</b>
		<p>early as there are high levels of competition for suitable sites in and around the Thames estuary. Ideally, we would rather flood management measures avoid the loss of designated habitat entirely, but Natural England recognise that this may not be feasible given the local area. It may be necessary to explore habitat creation options as a compensatory measure and there will need to be a comprehensive plan for any such proposals including a robust long-term monitoring programme to ensure that compensatory measures are functioning effectively.</p> <p>Note: Similar comments were also made by NE in their response to the HRA.</p>	
	Policy SD9 – Water Supply	Natural England welcomes the requirements for new development to incorporate	CPBC have commissioned consultants to prepare a Water Capacity Assessment. This work is programmed from completion in Q1 2026. CPBC will continue

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
	and Waste Water	<p>water efficiency measures and achieve stringent standards. Useful reference can be made to the recently published Shared Standards for Water Efficiency in Local Plans. The Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex &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.</p> <p>It is your authority's responsibility to determine that the Local Plan meets the statutory obligations for nature recovery, set out in Annex D of the Standards. We advise that implementation of the recommendations in the Shared Standards are one way for your</p>	<p>to keep NE informed of this additional work. This will supplement the Shared Standards for Water Efficiency in Local Plans.</p> <p>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</b> 90-litres per person per day of mains supplied water/potable water per person per day. <del>Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply.</del></li> <li>2. All non-residential development should achieve full credits for <del>Wat 01 of BREEAM. New, extended or redeveloped non-household</del> ('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 <b>WAT01</b> 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.</li> </ol>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>authority to meet its nature recovery and protection obligations, in relation to your plans for growth and water scarcity. This includes undertaking an integrated water cycle study to inform the local plan and assess the need for the water efficiency measures in your LPA area to address the impacts of growth on nature recovery obligations.</p> <p>Recommended policy wording around water efficiency, for inclusion in Local Plans, is set out in the Shared Standards. We support the policy requirement that all new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development.</p> <p>The policy stipulates that this must include confirmation that</p>	<p>New paragraph as follows</p> <p><b>5. A Water Efficient Design Statement should 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:</b></p> <p class="list-item-l1"><b>a) Baseline information relating to existing water use within a development site; and</b></p> <p class="list-item-l1"><b>b) Calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling).</b></p> <p>A new paragraph to be added to the reasoned justification:</p> <p><b>The Shared Standards in Water Efficiency for Local Plans (June 2025) set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex &amp; 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</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.</p>	<p><b>water efficiency standards for new homes and commercial developments.</b></p>
Policy Infra4 – Open Spaces		<p>We support the need for standards to ensure the adequate provision of open space in Castle Point. The design of new open space should be informed by local needs and opportunities, and provision should be sufficient to meet the requirements of new communities. As a baseline, Natural England recommends a standard of 3Ha of accessible greenspace per 1000 people, with no net loss or reduction in this capacity.</p> <p>A higher level of provision of 8Ha of accessible greenspace per 1000 people may be needed where there are recreational pressure concerns on coastal Habitats Sites.</p>	<p>Broad support for open space standards noted</p> <p>Modifications proposed as follows:</p> <p><u>New addition to Policy Infra4</u></p> <p>6. New open spaces will be required for major developments on grey belt sites and greenfield sites in the urban area, <b>according to the Council's Open Space Needs Assessment quantity, access and quality standards</b>. <b>These</b> 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> <p><u>Modification to supporting text</u></p> <p>19.52 The Castle Point Open Space Needs Assessment <b>recommends</b> standards for ensuring there is an adequate provision of open space across the Borough over the Plan</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes																																
			<p>period <b>are set out below.</b> <b>It</b> 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. <b>Meeting these standards will also ensure that Natural England's 3ha/1000 population accessible greenspace standard is achieved.</b></p> <p>Add Title to Table 'Table x: Open Space Needs Assessment Quantity, and Access Standards'</p> <p>Delete final column in table 'Additional open space to be delivered .....')</p> <table border="1" data-bbox="1096 727 1994 1330"> <thead> <tr> <th data-bbox="1096 727 1320 886">Typology</th><th data-bbox="1320 727 1545 886">Quantity standards (ha/1,000 pop)</th><th data-bbox="1545 727 1769 886">Access standard (walking time, straight line)</th><th data-bbox="1769 727 1994 886">Additional open space to be delivered over the Plan period</th></tr> </thead> <tbody> <tr> <td data-bbox="1096 886 1320 922">Allotments</td><td data-bbox="1320 886 1545 922">0.2</td><td data-bbox="1545 886 1769 922">15 mins (720m)</td><td data-bbox="1769 886 1994 922">2.45 Ha</td></tr> <tr> <td data-bbox="1096 922 1320 1002">Amenity Green Space (sites &gt;0.1 Ha)</td><td data-bbox="1320 922 1545 1002">0.6</td><td data-bbox="1545 922 1769 1002">10 mins (480m)</td><td data-bbox="1769 922 1994 1002">7.43 Ha</td></tr> <tr> <td data-bbox="1096 1002 1320 1081">Parks and Recreation Grounds</td><td data-bbox="1320 1002 1545 1081">1.1</td><td data-bbox="1545 1002 1769 1081">15 mins (720m)</td><td data-bbox="1769 1002 1994 1081">13.46 Ha</td></tr> <tr> <td data-bbox="1096 1081 1320 1133">Play Space (Children)</td><td data-bbox="1320 1081 1545 1133">0.7</td><td data-bbox="1545 1081 1769 1133">10 mins (480m)</td><td data-bbox="1769 1081 1994 1133">0.87 Ha</td></tr> <tr> <td data-bbox="1096 1133 1320 1186">Play Space (Youth)</td><td data-bbox="1320 1133 1545 1186">0.7</td><td data-bbox="1545 1133 1769 1186">15 mins (720m)</td><td data-bbox="1769 1133 1994 1186">0.87 Ha</td></tr> <tr> <td data-bbox="1096 1186 1320 1281">Accessible Natural Green Space</td><td data-bbox="1320 1186 1545 1281">1.80</td><td data-bbox="1545 1186 1769 1281">15 mins (720m)</td><td data-bbox="1769 1186 1994 1281">22.03 Ha</td></tr> <tr> <td data-bbox="1096 1281 1320 1330">Total for new provision</td><td data-bbox="1320 1281 1545 1330">3.84</td><td data-bbox="1545 1281 1769 1330"></td><td data-bbox="1769 1281 1994 1330">47.02 Ha</td></tr> </tbody> </table>	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)	7.43 Ha	Parks and Recreation Grounds	1.1	15 mins (720m)	13.46 Ha	Play Space (Children)	0.7	10 mins (480m)	0.87 Ha	Play Space (Youth)	0.7	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
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)	7.43 Ha																																
Parks and Recreation Grounds	1.1	15 mins (720m)	13.46 Ha																																
Play Space (Children)	0.7	10 mins (480m)	0.87 Ha																																
Play Space (Youth)	0.7	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																																

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p><u>Amendments/Additions to Supporting Text</u></p> <p>19.56 A Habitats Regulations Assessment will be required at application stage for any facility near to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked land), in order to demonstrate no adverse effects on site integrity. <b>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.</b></p> <p><u>General SoCG Comment:</u></p> <p>As set in policy ENV3 above, CPBC remains committed to RAMs and the requirement for SANG on larger residential developments through the HRA process in recognition of the recreational pressure concerns on coastal Habitats Sites. CPBC is one of 12 LPAs which uses the Essex RAMs SPD. This requires all new development to pay a tariff which is aimed at mitigating the effects of visitor pressure on coastal habitats sites.</p>

**Comments on the HRA**

Rep Number	Local Plan Reference	Summary of representation	Agreed response and Reasoned Justification Changes
0341	HRA	<p>We agree with the policies and allocations screened in for appropriate assessment (AA).</p> <p>As indicated in section 2.3.2 of the report, Natural England has previously advised that it is satisfied with the conclusions of the HRA Scoping Report (Place Services, May 2024) with regards to the relevant Marine Protected Areas (MPAs). The Scoping Report considered that “a Marine Conservation Zone Assessment for the Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone (MCZ) is not currently required due to the distance between the Castle Point LP Area and the MCZ (Over 4km) and development within the Local Plan boundary is unlikely to impact the MCZ features”.</p> <p>We note that the AA has made a number of recommendations to enable the Plan to avoid adverse effects on the integrity of any Habitats sites, either alone or in combination with other plans and projects, which have been incorporated into the Plan. Section 7.1.3 states: The Local Plan has embedded mitigation within the Reasoned Justification for SD1 to avoid Adverse Effects on Integrity from planned tidal flooding stemming from the Thames 2100 Plan, as this is supported by Policy SD1. It is recognised that compensation will be required for the loss of terrestrial habitat within Benfleet and Southend Marshes SPA and Ramsar Site.</p>	<p>21.13 - The TE2100 Plan, prepared by the Environment Agency and partners, sets out a policy for the maintenance and improvement of the sea defences on Canvey Island in line with climate change projections. Improvements have already been delivered to the Island’s southern revetments and will be required over the next 40 years to keep up with climate change. The Council will work with the Environment Agency to ensure that these ongoing improvements are delivered. Any works to retain or enhance sea walls, or within the 19m safeguarded buffer zone, should <b>prioritise avoiding the loss of designated habitat or</b> causing adverse effects on site integrity. This will need to be demonstrated through a project level HRA.</p> <p>Also See modifications to paragraph 21.18 in the table above that derive from Natural England’s comments on the</p>

	<p>Natural England would prefer that flood management measures avoid the loss of designated habitat entirely, but Natural England recognise that this may not be feasible given the local area. Identification and development of compensatory habitat is a complex and resource intensive process and Natural England would like to be consulted at as an early a stage as possible to ensure that any compensatory measures are sufficient. We would encourage Castle Point to identify compensatory sites well in advance as there are high levels of competition for suitable sites in and around the Thames estuary. It may be necessary to explore habitat creation options as a compensatory measure and there will need to be a comprehensive plan for any such proposals including a robust long-term monitoring programme to ensure that compensatory measures are functioning effectively. The report concludes that adverse impacts upon water quality can be achieved through the delivery of the Asset Management Plans of the water supply company and the drainage undertakers, through the use of SuDS and ensuring that Water Recycling Centres (WRCs) have the capacity to accommodate growth. Natural England is satisfied with this, noting Policy SD9 water supply and waste water requirements; in particular, that all new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development including confirmation that there is adequate quantitative and qualitative capacity at</p>	<p>Castle Point Plan as well as NE's comments on the HRA.</p>
--	---	---

		<p>the WRC that will serve the development. We agree with the other mitigation measures that have been put forward (see 7.1.6) including the requirement for 'down-the-line' assessment (7.1.7) using the best available evidence (7.1.8).</p>	
--	--	--	--

<b>Comments on the SA/SEA</b>			
<b>Rep Number</b>	<b>Local Plan Reference</b>	<b>Summary of representation</b>	<b>Agreed response and Reasoned Justification Changes</b>
0341	SA/SEA	<p>We have been unable to review this in great detail but we have the following comments and observations:</p> <p>We agree with the findings in 6.2.2 that there is a mix of positive and negative effects for the biodiversity objective. We note that impacts on biodiversity are highlighted as uncertain to negative for some sites and mitigation may be required to make proposals acceptable. Down-the-line project level assessments will be required to develop mitigation measures in greater detail.</p> <p>We note that 'Cumulative negative 'in-combination' and trans-boundary effects may stem from the potential level of growth in the Plan area and growth across Essex as a whole' (6.2.3). Please note that the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which is set up to account for the 'in combination' effects of new housing on coastal Habitats site is currently being reviewed and will be updated with the current findings.</p>	Comments noted.

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

**6.1** There are no areas without agreement.

## **8. Ongoing Cooperation**

8.1 CPBC and Natural England have met their duty to cooperate in the production of the Plan

8.2 CPBC will continue to engage with NE throughout the examination of the Castle Point Plan and through its role as a statutory consultee for plan making and planning applications, through participation at relevant subregional level events including RAMS meetings in addition to the matters previously highlighted in paragraph 2.1.

## Signatories



For and on behalf of Castle Point Borough Council:

**Name and Position:** Amanda Parrott, Assistant Director, Climate and Growth

**Date:** 9 January 2026



For and on behalf of Natural England

**Name and Position:** Fiona Martin, Senior Officer for Strategic Solutions,  
Sustainable Development – West Anglia Team

**Date:** 23 January 2026