



**Representations in response to the Castle Point Core
Strategy Final Publication Document 2009**

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Foreword

The Canvey Island Independent Party realise that Castle Point Borough Council (CPBC) has provided a representation form to formally consult on the Core Strategy Final Publication Document; however, we are sure the council can appreciate that it is difficult to suitably capture the Canvey Island Independent Party's responses using this method. We thank the council for permitting our response as a whole report, and have respectfully structured it to be easily read alongside the Core Strategy Final Publication Document.

Preface

The Canvey Island Independent Party acknowledges that, due to its existence, it has a parochial outlook of plans to develop Canvey Island, but assurance is made that its policies are representative of residents and other stakeholders. This does not mean, however, that the whole of Castle Point and areas beyond have not been considered in preparation of this report.

The following sections mirror the structure of the Core Strategy Final Publication Document (October 2009) with the same headings. Additionally, as requested on the representation form, the Section, Policy, Table, or Diagram numbers are included, along with the page number(s), for cross-referencing purposes. The cross-referencing in this report is not applicable to any other document.

This report will refer to the Core Strategy Final Publication Document (October 2009) as the Core Strategy (CS). If previous versions are referred to, it will be stated as necessary.

The whole CS has been reviewed by a Canvey Island Independent Party sub-committee and declaration of perceived soundness is made for each section, policy, table or diagram as is determined necessary. In general, the representations made below, question the soundness of the CS. This is mainly because there is no sense in acknowledging the sound components of the CS individually. It should be accepted that if there are no representations made to particular components of the CS, then they are generally perceived as sound; however, when something is declared as sound, it is because it has been assessed as very important, approved of, and should be adhered to after adoption of the CS.

The root failure to appropriately distribute the needs of the borough has resulted in many aspects of the CS being called into question. On this basis, along with other unsound aspects, we hope to demonstrate that with this CS, CPBC has failed in their duty to produce an appropriate spatial planning document that is of overall benefit to all Castle Point residents.

Core Strategy

3. Spatial Portrait of Castle Point, p.12

Table 2: A Portrait of Castle Point, Local People, p.12

The CS suggests that the population of Castle Point is divided into two distinct areas – the mainland towns (Benfleet, Thundersley and Hadleigh) and Canvey Island. Dividing the borough into these two distinct areas and producing a spatial plan based on this premise has led to the proposal of a majority of development being placed on a flood plain (Flood Risk Zone 3). It is more appropriate to suggest that there are four main towns in Castle Point – one of which is located completely in a Flood Risk Zone 3. The statement is misleading and unjustified.

Table 2: A Portrait of Castle Point, Role in the sub-region, p.13

The CS suggests that ‘Castle Point has a complimentary role to play by supporting [Basildon and Southend] in two respects’ – ‘as a residential area’ and a ‘green area’. Although this is agreed, there is not enough detail that reinforces the borough’s role as a labour pool for not only Basildon and Southend, but London as well.

In their Castle Point Employment Study Report (2006), commissioned by CPBC, Roger Tym and Partners make the following statements:

8.9 ▪ It is in the interests of Castle Point residents to ensure that development in Basildon and Southend is a success. Given the economic dependence of Castle Point on the economic vitality of neighbouring employment areas of Basildon and Southend, we suggest that the interests of Castle Point residents are well served by a resurgent jobs and employment market in Southend and Basildon. Castle Point should ensure that its strategies work well within this broad remit.

8.10 We suggest that Castle Point is best seen as part of a mini-conurbation dominated by Southend in the east and Basildon in the west. This mini-conurbation is, in turn, firmly within the London orbit. Castle Point’s role within this mini-conurbation is to provide workers for these three economic centres. This is implicitly recognised in the Planning Inspector’s deletion of the mention of Castle Point as a “business hub” in the original draft Regional Spatial Strategy⁴⁶.

It is very important to reinforce this point as it has significant implication on the spatial planning of Castle Point.

4. Vision, Aims and Objectives, p.21

Aims and Objectives, p.23

Table 3: Core Strategy Aims and Objectives, Aim: Deliver 2500 better quality jobs, p.24

There is no real qualitative statement defining the meaning of a 'better quality job'. In real terms, employees seek higher pay above any other single aspect of a job. It is possible to suggest that employers with employee development opportunities provide better quality jobs than those that do not, but in general this is not the primary motivation for employees. In their Castle Point Employment Study Report (2006), commissioned by CPBC, Roger Tym and Partners make the following statement:

3.10 Full time workplace earners earn only £411 compared to the county, regional, and national averages of £523, £512 and £518 respectively. This highlights the low quality of jobs on offer in Castle Point, which we discuss in more detail in the next chapter.

Under the 'Creating Employment Opportunities' heading, the CS states that there will only be growth in existing employment sectors which, as has been defined above, only provide 'low quality' jobs. Although admirable, evidence suggests that the aim is undeliverable, and therefore ineffective.

Table 3: Core Strategy Aims and Objectives, Objective: Deliver at least 18ha of additional employment development, p.24

If additional employment development is required, it should not be to the detriment of green space. The two sites (8ha and 10ha) are both open green space with the smaller site containing a football pitch. As will be explained under the heading of 'Creating Employment Opportunities', the loss of this green space for employment development is unjustified.

5. The Spatial Strategy, p.25

Points relating to the Spatial Strategy but not to a specific section

While we agree with the principles and acknowledge the aims of the Spatial Strategy, we have grave doubts that they are deliverable by the means outlined in the CS. For reasons described in this document, the Spatial Strategy is ineffective and unsound.

Distribution of Sustainable Development and Growth, p.27

Points relating to Distribution of Sustainable Development and Growth but not to a specific section

The method of determination of appropriate sites for development in the CS is a very contentious issue. The points/scoring system employed to assess the sites was

flawed and the surveys should not have been carried out by CPBC officers. Castle Point residents can perceive that they are not impartial and a third party professional consultancy or an independent panel would have been more appropriate – especially from the residents’ viewpoint.

The Core Strategy Further Preferred Options Report (2008) proposed the development of over 550 homes on the green belt site north of Daws Heath road. Only days before CPBC ratification - to accommodate for a protest by residents who campaigned to ‘save the green belt’ - the plan was hastily revised to remove this proposal and increase the housing allocations elsewhere. Although this shows flexibility in the plan, the decision was reactive, political, and not justifiably explained through robust evidence. Simply increasing the allocation of housing units in other already identified sites either indicates a lack of future growth planning detail, or that the original allocation numbers were not based on robust evidence. There is no evidence shown in the CS to justify, or even document, the changes.

The CS makes no mention of the options set out in the ‘Hickfort Plan’. This plan for development on green belt land to the east of Benfleet has never been before any committee or sub-committee, but has many aspects that are worthy of consideration. The vision of the plan is to relocate the poorly sited Manor Trading Estate and release a brownfield site suitable for over 2000 housing units. The new employment site would be adjacent to three major highway routes and between two main line railway stations, and is well positioned for any future large commercial development within the area. No justification has been made for dismissing this publicly supported option.

Details for the vision of Thorney Bay Park are severely lacking. Thorney Bay Park is a caravan site, located in the south of Canvey Island. It is progressively expanding to include long-term rental of mobile home style caravans, as stated on their website¹:

In a nutshell, a long-term rental on a caravan in Thorney Bay Park offers excellent value-for-money with tons of things to keep you occupied. You'll also be surrounded by people just as delighted with their way of life as you are.

Like Kings Park Village, on the north of Canvey Island, transformed from being a recreational caravan site into a large residential home park, Thorney Bay Park is progressively reproducing the transformation. Unlike the homes at Kings Park Village, however, the homes at Thorney Bay Park are not considered in the CS. If CPBC embrace and regulate the transformation from caravan site to residential park, hundreds of the required 5000 new homes in Castle Point will be provided. In failing to consider this reasonable alternative, the CS is unjustified and unsound. If homes on this site continue to remain unaccounted for, there is a danger of populating Castle Point beyond its required (and predicted) growth, and beyond its

¹ <http://www.thorneybay.co.uk/rentals.html>, accessed 8th January 2010

infrastructural provisions within the time frame of the CS. Unsustainable growth must be inhibited by the CS. It should be noted that CPBC is currently investigating the number of permanent residents on this site since effects of changes raised public concerns. The findings will help in shaping the CS.

Table 4: Spatial Distribution of Regeneration and Growth, p.28

Employment Growth and Regeneration

Canvey Town Centre is in great need of regeneration, including 'a broad mix of retail, leisure and community services'; however, the imposition of 400 new homes within a small area together with the obvious increased demands of road traffic is unsustainable.

The Charfleets Industrial Estate is in need of regeneration - not only to attract new business, but also to accommodate the businesses moving from the Point Industrial Estate; however, any further expansion of this site will attract more road traffic - especially heavy goods vehicles - which will increase congestion at the Waterside Farm roundabout. With no highways improvements planned to support expansion, the plan is undeliverable.

Canvey seafront is in great need of regeneration, but to ensure it remains a leisure hub, residential development must not be allowed within the traditional seaside frontage area. Castle Point has already approved plans for 32 flats in this location which endangers the historic character of the area. The CS does not specifically discourage this type of development in this location – for this reason the plan is inappropriate.

Housing Growth and Community Development

The CS does not clearly state that the whole Point Industrial Estate should be relocated within a minimal timeframe to ensure that the creation of brownfield land can be utilised for residential development before greenfield sites are used. In fact, Table 10 of the CS indicates that relocation will be piecemeal and will 'occur when a suitable site is found at West Canvey'. Table 23 of the CS states the plan to develop green belt sites for housing from 2009. This is inappropriate and not consistent with aspirations to utilise previously developed land.

Land to the East of Canvey Road is the last piece of natural green belt accessible to residents living in deprived areas on the urban periphery. It is unjustified to consider this location for development from 2009 (Table 23, CS) before previously developed sites.

Any proposed development on land fronting the west of Canvey Road must adhere to PPG15: Planning and the Historic Environment in order to protect the Dutch Cottage Museum. It is unreasonable to believe that a 50 unit building 'for older people', located to the south of the Dutch Cottage Museum, will not overshadow the protected building. Other reasonable alternatives are lacking, deeming the plan

unsound. The site is adjacent to one of the busiest road junctions on Canvey Island with fast moving traffic and a history of accidents. Between Northwick Road, the main route to Morrisons supermarket, and the Canvey Road dual carriageway which leads on and off of Canvey Island, the site is 30 metres away from Charfleets Industrial Estate. It is far from ideal to be considered acceptable as a location for 'specialist housing provision for older people' and is judged as unsound planning. The development will cause local job losses as the land is currently home to the only garden centre on Canvey Island, which is also a central point that residents meet and interact. If change of use goes ahead and the garden centre is displaced, then it will lead to increased traffic leaving Canvey Island on already congested highways. This is not sustainable and is therefore unsound. This area suffers from antisocial behaviour in the form of off-road motorcycles speeding past the site, causing residents to fear for their lives. Neither Castle Point Council nor the police have been able to solve the problem, which raises the question of suitability as dwellings for older residents. A more suitable site should be found, probably near to the town centre. This plan is not sound.

The envisaged vocational college is essential for Castle Point to provide appropriate skills training for local jobs, especially with plans to reduce the number of secondary schools on Canvey Island. Replacing the existing school – built on green belt land – with a college and a children's play area provides the community with two, much needed community facilities; however, the green belt land should not be utilised for housing development while other reasonable alternatives remain unexplored.

Sustainable Growth and Environmental Conservation

To provide for 650 new homes on previously developed land within the urban area of Canvey Island is welcomed; however, there is no evidence to show where these sites are, the effects on the local infrastructure of building these new homes, nor any spatial planning strategy in the CS to sustain these developments. This number of new homes, along with the proposed 800 in Benfleet, Hadleigh and Thundersley is far too many to propose with no spatial planning provided. This is unsustainable and inappropriate.

The proposed 'area of public open space...to the west of Canvey Island' is under consideration as an intertidal habitat creation site, but this fact is not acknowledged in the CS.

6. Core Policies, p.30

Community Infrastructure, p.30

Points relating to Community Infrastructure but not to a specific section

We are disappointed that no provision is given for Sure Start Children's Centres on Canvey Island even though two of these facilities have been provided for on the mainland. To be consistent with the CS spatial portrait, provision should be shared equitably between Canvey Island and the mainland, i.e. one for each area.

Section 6.4, p.30

Where there is current recognition of a requirement to replace existing community facilities, these should be specified and any alternative uses identified. If a facility is known to be unfit for purpose, the vision for its future most definitely should be planned for in the CS. Not to do so is inappropriate.

Any future strategic programmes of infrastructure replacement (community or other) should identify alternative uses for existing provision BEFORE the new provision is in place. Otherwise, any requirements necessary for the alternative use cannot be identified and provided for. This is basic planning and must be implemented to enable effective planning.

Policy CP1: Delivering Community Infrastructure, p.31

Building Schools for the Future - Castle View School Redevelopment

In principle we agree with the new development programme, but disagree with Essex County Council's education formula which calculates the number of school places required for the future. It is not credible, for example, to imply that a three bedroom home will only accommodate two adults and two children.

We believe that predictions for future need have been underestimated and will leave schools oversubscribed, leading to children having to leave Canvey Island to be schooled elsewhere and an increase of traffic on an already over stretched road infrastructure.

ECC/SEEVIC/CPRP - Canvey Island Vocational Centre

We consider this project justified, and is welcomed on condition that the centre is built on the existing Castle View site 'developed land' – not the playing fields or green belt land surrounding it. This project has previously encountered funding issues and we are concerned that it may be undeliverable as funding could be withdrawn even if the project is approved through the planning process. It is reported that funding can be raised by sale of the surrounding school land proposed for housing development in the CS. Public opinion suggests that the local community

objects to the sale of this land for housing development and there is no credible evidence that challenges this view.

PCT/LIFT - Primary Healthcare Centre at West Canvey

This location is too far out of the community reach for Canvey Island residents and is deemed fundamentally flawed. It is situated near the busy road intersection at Waterside roundabout, Somnes Avenue, and Canvey Road. Residents of Castle Point will have to travel by road leading to more traffic on and around Waterside roundabout. We acknowledge the need for this facility but it is in the wrong location. Section 6.3 clearly states that 'Community facilities should be located in town centres or other accessible locations'. It is not credible to suggest that this location will 'maximise community access' or 'reduce the need for multiple journeys' and as no reasonable alternatives have been considered, the CS is not justified and therefore, unsound.

Renewal of Waterside Farm Sports Centre

When the Castle Point Policy and Development Groups split into task and finish groups, the group responsible for leisure centres were told that a structural survey was taking place at Waterside Farm Sports Centre. To this day there is still no evidence of the survey or results produced and we therefore object to this contentious issue. The group felt they had no input into the findings and outcomes. An amendment (from Cllr. Martin Tucker) added to the document suggesting refurbishment rather than renewal was accepted by the joint policy and development group, but is not seen within the CS. Although some engagement with councillors was made, many decisions have been dismissed or ignored. We find this part of the policy unjustified because the recently commissioned structural survey of Waterside Farm sports centre has never been published for scrutiny by councillors.

Renewal of The Paddocks

The Paddocks is the community hub for Canvey Island. The building and surrounding land facilitates cultural events, shows, and clubs. It is perfectly located next to the town centre with ample parking provision for the new Primary Healthcare Centre. It is vital this facility is refurbished (not renewed) in line with Runnymede Hall on the mainland, i.e. by 2014 and not 2016 as proposed. There is no justification not to do this, proving the CS to be unsound. As no structural survey has been made on The Paddocks to suggest refurbishment is not a viable policy, then renewal is unjustified and the CS is unsound.

Green Infrastructure, p.33

Policy CP2: Protecting and Enhancing Green Infrastructure, p.35

It is presumptuous to consider 'Further development of a sub-regional park covering West Canvey Marshes' as a deliverable key project while there are contesting plans for the site. The West Canvey Marshes site is currently being considered for use as 'intertidal habitat creation/replacement' by the Environment Agency within the Thames Estuary 2100 Plan which will seriously jeopardise the CS vision. To ignore this major conflict of ideas raises concern over the soundness of this CS key project. It has been reported, though not verified, that the Environment Agency could delay making its decision for ten years, but this is still relevant to this CS.

Intertidal habitat creation/replacement on the West Canvey Marshes site will result in the loss of 254 ha of 'greenfield' public amenity² – 23% of Canvey Island's total 'greenspace'³. In addition to the CS plan for developing public amenity 'greenfield' land to the East of Canvey Road 'to provide a community hub...and up to 400 homes' there will be minimal public amenity greenspace remaining. This does not satisfy the aspirations made in the first paragraph of Policy CP2 'to provide an enhanced network of green infrastructure...that creates high quality living landscapes, and enhances opportunities for recreation', making this part of the CS Plan unsound.

Policy CP2: Protecting and Enhancing Green Infrastructure, p.35

It is a general expectation that developers contribute towards the community in which they develop, and is welcomed for 'green infrastructure projects and nature conservation'; however, Policy MI3 of the CS also expects developers to contribute towards many other aspects of the community which is arguably unsustainable, i.e. developments become less economically viable with an increase of expected contribution. There must be more detailed guidance on how the contributions will be managed so assurance is given that funds are allocated equitably.

Transport Infrastructure, p.36

Points relating to Transport Infrastructure but not to a specific section

Considering the proposed residential and commercial development outlined in the CS, there is a distinct lack of projects which can effectively improve transport infrastructure on Canvey Island. The aims, timelines and proposals do not address the issues and are inadequate. The road improvements outlined are limited to the west of Canvey Island and no vision is made for further improvements. We find the road infrastructure parts of the policy lacking in depth, and therefore unsound.

² Source of Information: RSPB

³ Source of Information: Land Use Statistics – Generalised Land Use Database, 2005

The Canvey Island road system has evolved over many years from a network of country lanes and piecemeal development with no overall plan. The only dual carriageway is to the west of Canvey Island - Canvey Road, Roscommon Way and a small part of Somnes Avenue. All other roads are either single lane or single track roads where traffic can only pass through a network of minor junctions before converging at Waterside Farm roundabout – the only junction providing access and egress for Canvey Island.

With Canvey Island having no on-going routes, the expansion of Charfleets Industrial Estate will lead to more and larger heavy goods vehicles using Canvey Way and Waterside Farm roundabout.

The proposed building of 1875 new dwellings and the resultant extra vehicle journeys, will lead to even more congestion on an already overloaded road system. It is a matter of record that any traffic accident or vehicle breakdown leading off of Canvey Island can lead to a gridlock situation spreading to the whole of Castle Point and beyond for up to 6 hours. The road improvements to Canvey Island that are proposed will have limited effect on improving traffic flow.

No provision has been made for the supporting road traffic that will follow the developments of the Thames Gateway Port, the refurbishment of Southend Airport or the 2010 Olympic Site.

Benfleet Station on the Fenchurch Street to Shoeburyness line is the main station for commuting to London. The trains cannot cope comfortably with the number of travellers now and the extra number of dwellings on Canvey Island will only lead to an increase in more train journeys or more motorists.

Policy CP3: Delivering Sustainable Transport Infrastructure, p.38

In their Castle Point Employment Study Report (2006), commissioned by CPBC, Roger Tym and Partners make the following statement:

<p>5.19 Instead, we would suggest that there is a clear labour market argument for improving public transport in the area, particularly targeted at the ability of Castle Point residents to reach employment in Southend and Basildon.</p>

We agree with this statement and would welcome improvements in public transport; however, an issue that is not identified in the CS is that there is no effective link from Canvey Island to Benfleet Station. The only way for Canvey Island residents to travel to the railway station is by using the aforementioned road infrastructure which is especially congested during rush hour times. There is no rail link and all buses and taxis have to pass via Waterside Farm roundabout. Without a plan to address this situation ‘the aim of reducing transport deficiencies’ is undeliverable, thus rendering this policy ineffective and unsound.

Water Supply and Waste Water Infrastructure, p.39

Section 6.32, p.39

The stated fact that the Canvey Island Sewage Treatment Works (STW) will exceed its qualitative license without upgrading gives cause for concern. The CS does not identify a reasonable time frame for renewal or indicate how it will be financed; this issue should be prioritised before any development goes ahead. There is no consideration given to the large expansion of Thorney Bay Camp caravan site which is adjacent to the STW. This section lacks sound infrastructure delivery planning and is unsound.

Local Flood Risk and Surface Water Management, p.41

Points relating to Local Flood Risk and Surface Water Management but not to a specific section

Canvey Island has a flat topography and therefore has no natural gravity feed drainage system. The present system is old and in need of renewal for both surface water and sewage.

There is no safe egress from Canvey Island in case of flooding as all roads converge at one junction – Waterside Farm roundabout. In the event of a major disaster Canvey Island will have to rely on its own emergency services.

The policy itself seems to address flood risk and surface water management in general, but the CS vision has failed to recognise the implications of massively developing Canvey Island. The Environment Agency TE2100 plan states that for Canvey Island ‘The chances of the defences failing or being overtopped are very small, but the consequence of such a failure is very high.’ The CS vision needs to explore the reasonable alternative of allocating more development to the three towns of Benfleet, Hadleigh and Thundersley – the areas which are not in a Flood Risk Zone. It is our view that reasonable alternatives have not been considered and the CS vision is not justified.

Section 6.39, p.41

The relatively low market value of housing on Canvey Island compared to that of the mainland towns gives reason to question the economics of including SUDS with developments on Canvey Island. With the imposition of SUDS alongside the other expected developer contributions the vision of increased housing is likely to become undeliverable.

Policy CP5: Local Flood Risk and Surface Water Management, p.42

We are surprised at the dismissive attitude of this policy which does not fully consider the implications of building in a Flood Risk Zone 3 area. It is not necessarily a departure from national policy, more ignorant of guidance, but we find this policy.

The conclusions and proposals set out in this policy are not sustainable. Any new build will continue to put pressure on the existing system and lead to an increase in building costs. Emergency vehicles will not be able to access Canvey Island because of foreseen problems at Waterside Farm Roundabout.

Castle Point Council has not proposed or approved an emergency plan to ensure the safety of all Canvey Island residents in the event of flood. It is unreasonable to suggest that if each new household and business on Canvey Island can mitigate against flood, then the whole population is protected. We acknowledge that Table 14 of the CS shows the intention to provide an emergency plan, but a clause in the policy should include adoption of the plan in the first instance, and then assurance for its constant revision and improvement.

Creating Employment Opportunities, p.44

Section 6.40, p.44

According to National Statistics NOMIS data, 1500 jobs have been created in Castle Point between 2001 and 2008. At this rate, around 5000 jobs could be created by 2026 – double the 2500 target. Roger Tym and Partners, the consultants commissioned by Castle Point Borough Council to provide the Castle Point Employment Study (2006), have ‘suggested’ and explained in their conclusions that to significantly exceed the target ‘might be unwelcome’.

The aspiration to reduce out-commuting, although commendable, does not appear to be realistic. Roger Tym and Partners have concluded that for out-commuting to fall, then ‘[local] jobs will need to be sufficiently well paid to bid labour away from jobs elsewhere.’ They question ‘whether this scenario is particularly realistic.’ As the CS does not make provision for growth in higher paid employment sectors, it is unsound to ignore the consultants’ professional opinion.

Section 6.44, p.44

Regarding the above information, it appears that the 18 ha of undeveloped ‘greenfield’ land is not immediately required for employment use. The proposal to develop the undeveloped 8 ha Northwick Road site on Canvey Island (starting 2010) should not be prioritised above the Canvey Island town centre regeneration (starting 2012), as indicated in Appendix B.1, Table 25 of the CS. There is no justification for this and is unsound as a result.

Section 6.49, p.45

Regeneration of the Manor Trading Estate with ‘renewed employment provision’ and ‘200 new homes’ may appear to be a positive plan, but according to Appendix B.3 of the CS, it will not create further employment. Unjustified dismissal of publicly supported options such as the ‘Hickfort Plan’ to relocate the Manor Trading Estate businesses and heavy traffic away from residential dwellings and closer to the strategic road network, while creating the opportunity to build over 2000 homes on

the Manor Trading Estate site, has resulted in a plan that will not allow for sustainable growth beyond 2026.

Improving the Vitality of Town Centres, p.47

Points relating to Improving the Vitality of Town Centres but not to a specific section

We acknowledge the need to regenerate Canvey Island town centre however are concerned that it must encompass the wishes aspirations of the residents and not be confined by purely financial restrictions, this will be a once in a lifetime opportunity to enhance and modernise Canvey Island town centre

Now we have seen the plan for Canvey Island Town Centre, the vision of the CS must reflect the government's "A Spatial Vision for the Future", which states that 'development must be modern and dynamic'. We agree with this policy but to significantly regenerate Canvey Island town centre it must have a good supporting road infrastructure and have good community projects to support and sustain its revival. It is imperative that the CS provides this.

Meeting Housing Needs, p.49

Section 6.63, p.49

The Canvey Island Policy Unit of the Environment Agency TE2100 Plan states that:

'Vulnerable development such as single storey buildings, mobile home parks and camp sites should have escape or community refuge plans. If this is not possible, they should be replaced by other uses or buildings which have living accommodation above flood level.'

Although bungalows are desired by some 'older people', the CS has not specified that they should preferably not be built on Canvey Island, especially as the Council has no community recognised 'escape or community refuge plans'.

Section 6.82, p.52

There is no statement of how developers will provide 3% of new homes designed to the lifetime homes standard. Realistically, a developer has to build a minimum of 33 units to include just one designed to the lifetime homes standard. It is unsound and seen to be unsustainable.

South Canvey – A Long Term Strategic Location, p.54

Section 6.83, p.54

Since publication of this CS, BP (British Petroleum) has leased the Oikos site with ambitions to upgrade/develop it. The CS must be strong in its policies to ensure that Castle Point becomes 'a safer place' not only by 'promoting the removal of hazardous installations', but by positively encouraging

Section 6.86, p.54

Despite the statement 'Alternative development of the Thorney Bay Caravan Site would be desirable as caravans are particularly vulnerable to the effects of incidents on the hazardous installation site', CPBC continue to allow the expansion and development of Thorney Bay Caravan Site for full time use.

Policy CP9: South Canvey – A Long Term Strategic Location, p.55

1. While this policy is laudable it does not acknowledge any national strategic energy requirements which will be the main argument for the retention of hazardous installations on Canvey Island.
2. CPBC's lack of a strong long term plan to encourage the removal of hazardous installations weakens their case to object to any redevelopment. This makes the CS ineffective and unsound.
3. There should be NO development between the consultation zones whilst hazardous installations are operational. We are opposed to any development in these high risk areas.

7. Monitoring and Implementation, p.56

Monitoring and Implementation Policies, p.56

Policy MI3: Developer Contributions, p.58

The statement 'Economic viability will be a consideration in determining the level of contribution sought' will jeopardise the sustainability of developer contribution funds meaning reduced provision of infrastructure. This is especially the case on Canvey Island as the elevated costs of building in a Flood Risk Zone 3 area.

Conclusion

Castle Point Borough Council's failure to appropriately distribute the needs of the borough has led to the proposed delivery of an unsustainable proportion of new housing development on Canvey Island.

Canvey Island has many problems to solve, none of which have been addressed in the CS. CPBC has decided to place all of the future commercial development on an island with very limited access to main roads and no onward route.

It is accepted that housing development on brownfield sites and in town centres enables sustainable growth; however, proposed development on green belt land is caused purely by a lack of good research and community engagement. For Castle Point to fulfil its role within the sub-region, it is required to house its residents, and remain a green area - *at the centre* - of a network of green spaces. To replace green space with housing is not only unsustainable, but unsuitable for Castle Point and the areas beyond its limits. The CS proposal to develop green belt land before brownfield land is unjustified.

The apparent and recognised risk of major flood occurrence has been disregarded by the simple and expedient conclusion of designing developments that have escape plans, i.e. access to a first floor location. This is an unacceptable attitude to the safety and well-being of the community.

CPBC with its flippant dismissal of the Hickfort plan, and the exclusion of Thorney Bay Park in the CS vision, are just two examples of unsound planning resulting from the general failure to fully engage with the local community and produce an evidence base with which to begin creating a vision for Castle Point. The evidence base for this Core Strategy appears to have been created and manipulated to suit a vision that is not only unsustainable, but completely unsuitable for its constituents.