

HOUSE OF COMMONS

Mr Ian Butt Head of Place and Policy Castle Point Borough Council Kiln Road Benfleet Essex, SS7 1TF

August 2024

Dear Mr Butt,

I am writing to you with my response to the Castle Point Borough Council Regulation 18 consultation for your emerging New Local Plan.

Before I begin, I would like to say how pleased I am that great efforts have been made by the Council, and indeed individual Councillors, to ensure this consultation is publicised among residents. I sincerely hope that residents' views and concerns will be taken into account and reflected in the formation of the plan going forward.

Please see my response to the specific questions listed in the Local Plan Issues and Options attached. I thought it would also be beneficial to include a front page summary consisting of the most important points I wish to make, particularly related to the plan period, site selection and infrastructure.

- 1) A large number of the brownfield sites identified as options for development are parts of key community infrastructure and should be removed as options at the earliest possible opportunity. These include a fire station, a police station, several supermarkets, large council owned town centre car parks, churches, two community halls, three libraries, health centres in Benfleet, Thundersley and Canvey and USP (formerly SEEVIC) College. Under no circumstances should these key pieces of community infrastructure be demolished in favour of residential development and I am frankly baffled at their inclusion in this consultation.
- 2) The Council should look to preserve the Green Belt sites on the urban periphery of our Borough that local residents clearly attach a great deal of value to. The protection of fields in the Green Belt used for farming and grazing should be a priority of the plan. I am pleased that the Council is looking to preference brownfield land for development. However, if the Labour Government effectively force you to allocate Green Belt for development, the <u>ONLY</u> site in Castle Point that should be considered for residential development by the Council is what is listed in the plan as the North West Thundersley site. This site is shielded from the rest of the Borough by Woodside Hill encompassing Woodside Park, which should be retained in its entirety and enhanced. Various capacity studies in the past have identified the site as suitable for several thousand units of the Borough's housing need, and its density could be intensified to ensure other Green Belt sites are protected. Its realisation would affect existing residents far less than any other Green Belt site on the urban periphery of our Borough. As it is mainly plotlands, light industry and sites that cannot be accessed or

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viewed by residents, its utility as Green Belt is minimal especially when compared to other Green Belt sites listed as options in this consultation. However, if it is to be included into the plan, the Council should absolutely guarantee that a much needed extra road access into and out of the Borough and onto the wider road network via the A127 or the A1295 should be included. The Council should also examine the viability of moving Manor Road Trading estate to the area instead and redesignating the area for residential development. This would remove the problem of lorries heading to and from the estate having to traverse local residential roads.

3) I am also very concerned that the Council are asking residents whether they support development on a large number of both brownfield and Green Belt sites before their 'deliverability' has been established, or even before the Council have asked if the owners are willing to actually build homes on their site. The deliverability of all sites will have to be determined before Councillors are presented with options for site selection, but I believe the deliverability, or at least the availability, of sites should have been determined before the public consultation. Residents will feel deceived if they take the time and effort to either support or oppose the inclusion of specific sites local to them for development in the plan if those sites never had a prospect of being delivered in the first place. It also opens up the Council to the very serious risk that Councillors may include brownfield sites that are not deliverable into their site selections in an attempt to preserve Green Belt sites and reflect residents' wishes, only to have their selections challenged at examination by developers looking to include their Green Belt sites for development instead. Undeliverable sites should be removed from consideration as soon as possible.

I am further concerned about this following the announcement by the new Deputy Prime Minister, that Castle Point is likely to face a housing target that would mean an extra 6000+ units built in our Borough. The Government may well look at the options presented in this document and believe that together they represent the true capacity of Castle Point for development, when it is in reality far from the case, many of these sites are undeliverable and our local infrastructure would be stretched beyond breaking point.

- 4) Brownfield development around our town centres should be supported as one of the main solutions for our local housing need that would also support our town centre businesses by growing the market on their doorstep. This however should not come at the expense of commercial land and employment sites and not at a density level that would put intolerable strain on local infrastructure. Some floors of flats above a ground floor reserved for commercial and employment activity should be the preferred solution for such sites as long as adequate and realistic parking can also be provided for the development.
- 5) The Council should submit a fifteen-year plan for development rather than a twenty-year plan. There is no legal requirement for the Council to submit a twenty-year plan and by adding five years to the length of the plan, it means that the Council have to accommodate five more years of housing need in their plan. In December last year you as the Council conducted your own local housing need study, as was permitted under the previous Government, which came up with a need of 255 homes a year. By adding another 5 years

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to the plan, you are having to find sites for 1275 extra homes that are not necessary. The Council should reduce the length of the plan to 15 years and plan for 1275 fewer homes.

- 6) I am personally very dismayed that the Council failed to use the lower assessed housing need figure they contained in the local housing need report they released in December 2023 to defend against recent speculative planning applications and appeals on Green Belt. It would have seriously strengthened their case. I understand the Council does not want to run the risk of the report being legally challenged before the local plan examination, but by then there may well be very little Green Belt left worth defending if developers keep exploiting this legal weakness.
- 7) Flooding needs to be a key concern of this local plan. Localised flooding is a key concern of many residents, particularly on Canvey, and special attention should be given to localised flood prevention measures and the capacity of the existing drainage system to take further runoff from development. Similarly, the Council has made no reference to any outcomes of the Section 19 Flood Report released in 2022 regarding the flooding of dozens of homes across Castle Point in Autumn 2021.
- 8) I am pleased that there are references to an additional road access for Canvey Island in the issues and options document. However, the Council should start actively seeking it now. The Council should immediately reinstate work on the Canvey West Access Taskforce that has been dormant for two and a half years, bring all the parties together and start planning now. I have always been willing to take funding requests to the Government but as of now the Council have not produced a single piece of paper for a proposal.

Please see my views on the potential brownfield development sites I would personally support in the attached table, accepting that Green Belt development should not be supported, except on the North West Thundersley site south of the A127 if the Labour Government effectively force the Council to develop what they are calling 'grey belt'.

Once again, thank you on behalf of local residents for the opportunity to express our views on the Issues and Options document for the Castle Point Local Plan. I sincerely hope that every response from local residents will be given the utmost consideration as everyone has an interest in the future of our Borough.

Kind regards,

Dame Rebecca Harris MP Member of Parliament for Castle Point



Answers to questions on local plan issues and options document:

Q1. What are your views on the draft Vision for the Castle Point Plan?

I think the vision is good, but there should also be a commitment to the preservation of the semi-rural character of the Borough through the protection of the Green Belt treasured by local residents adjacent to the urban periphery. I am pleased to see mitigation of climate change and its effects in the vision, but I think it needs to be much more explicit about protecting residents from the dangers of flooding. There should also be greater emphasis on the provision of improved local infrastructure.

Q2. What are your views on the issues that need to be addressed on Canvey Island within the Castle Point Plan?

A lack of infrastructure, specifically a third road access for the island. I am pleased to see this recognised in the document but the Council should commit to recommencing work on the Canvey West Access Task Force to maximise the chances that an access is actually delivered in the plan period. The protection of residential properties and businesses from flooding should also be a key issue, as should the mitigation of the two top-tier COMAH sites on the island and the preservation of the local environment. The plan should not attempt to increase the residential density of the island without improvements to local infrastructure.

Q3. Do you have any comments on how we should improve access to and through Canvey?

I am pleased a potential third road access is listed in the local plan options document. I am however disappointed to see potential problems with it listed before a formal scoping has been done. The Council should recommence work on the Canvey West Access Task Force immediately and pursue a third road access for the island as the most important transport priority for the Borough. The fact work on the Canvey Third Access Taskforce that myself and many other residents campaigned so hard for, has been abandoned by the Council since 2022 is inexcusable. It has unnecessarily set back the timeframe for achieving a third road access by years. All the other minor potential transport improvements listed would be beneficial and should also be explored.

Q4. What changes or improvements would you like to see in Canvey Town Centre?

It needs to be more welcoming and become more of a destination for retail and experiencebased economic activity like meals out and socialising with friends and family. More events would be beneficial as would an expansion of the market and improved parking. Ideally free parking for at least three hours to support local traders and increase footfall in the Council's own shopping centre. I would also like to see the loading bay area improved as it is an unsightly 'Welcome to Canvey' when approached from Elder Tree Road.

Q5. What type of development would you support within the Canvey Town Centre East development cluster?

& Q6. What type of development would you support within the Canvey Town Centre West development cluster? &

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Q7. What type of development would you support within the Long Rd development cluster?

&

Q8. What types of development could be considered as appropriate within the South & East parts of Canvey Island?

&

Q13. Do you have any views about the potential Site Allocations in Canvey?

The Council should prioritise protecting the Green Belt. Please see the attached list of brownfield sites I think could be suitably redeveloped. Please take the notes attached to each individual site into account regarding the type and density of development I believe would be appropriate.

Q9. What improvements to the Seafront Entertainment Area would you like to see?

Improved access and improvements to the visual environment. I would support whatever practical improvements local business owners would suggest as they know what would improve the experience for their customer base better than anyone else. Whatever improvements are implemented however, they should also have the support of local residents who live in or nearby the area.

Q10. Do you have any comments on Canvey's port infrastructure?

Ultimately the two top tier COMAH sites located on the Port of London Authority land should be relocated. Until then the Council should do all they can to ensure the safety and security of the sites is maintained and the local environment is protected for the benefit of residents.

Q11. What improvements should be made to the South & West Canvey Wildlife Corridor?

Improvements that increase the biodiversity of the corridor and that improve access for local residents for recreational and educational purposes. Any improvements or changes to the condition of the landscape however should fully take into account any implications they may have for flood risk in the area.

Q12. What approach to development in the West Canvey Employment Area (Charfleets Industrial Estate and the Canvey Retail Park) would you support?

An approach that leads to more well-paid jobs on the island and that local residents fully support.

Q14. What are your views on the issues that need to be addressed in Benfleet within the Castle Point Plan?

Stretched local transport and roads infrastructure, the need to improve the local town centres as a destination for local retail and experience based commerce like eating out and socialising. Local green spaces should also be preserved and enhanced where possible. Flooding issues around the council-owned South Benfleet playing fields, and others identified to properties in the Section 19 report on the floods that took place in the Autumn of 2021. The Benfleet conservation area should also be improved and enhanced.

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Q15. What changes or improvements would you like to see in South Benfleet Local Centre?

I think the environment of the town centre needs to be improved and made more inviting to ensure it is an attractive destination for local residents and for potential customers travelling through it.

Q16. What type of development would you support within the South Benfleet development cluster?

&

Q17. What type of development would you support within the Benfleet Station development cluster?

&

Q18. What approach should be taken to development in and around the South Benfleet Conservation Area?

Please see the attached list of brownfield sites I think could be suitably redeveloped. Please take the notes attached to each individual site into account regarding the type and density of development I believe would be appropriate.

Q19. What changes or improvements would you like to see in Tarpots Local Centre?

I think parking needs to be improved there as the bays actually along the south side of the Tarpots parade are too small. I would like to see general improvements to the environment in the area to improve its attractiveness as a local destination for convenience shopping and experience based commerce like eating out and socialising. Parking should be improved in general for the benefit of existing businesses and customers.

Q20. What type of development would you support within the Tarpots development cluster?

Please see the attached list of brownfield sites I think could be suitably redeveloped. Please take the notes attached to each individual site into account regarding the type and density of development I believe would be appropriate.

Q21. What types of development could be considered as appropriate within the Manor Trading Estate?

Ultimately I believe the Manor Trading Estate should be relocated and the land should be redesignated for residential use. This would take many lorries and other heavy goods vehicles off residential roads in that part of Thundersley. However, if this is deemed unviable then development for employment uses that facilitate the creation of well-paid jobs and do not see an inappropriate increase in heavy goods traffic in the area should be encouraged. Ideally I would like to see a new road put in to the north of the trading estate connecting it to the A127 or the Rayleigh Spur roundabout.

Q23. What improvements should be made to the South Benfleet Playing Fields area?

Anything that improves the environment or the utility of the park for local residents should be considered. The capacity and function of the playing fields as a flood water storage area should be improved and improvements that deal with persistent flooding issues around the north east of the park should be prioritised. The building in the park accessed via Brook Road

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that houses changing rooms, kitchens and a small seating area is a grossly underused community asset that could be used by far more local groups and for a range of purposes.

Q24. Do you have any views about the potential Site Allocations in Benfleet?

The Council should prioritise protecting the Green Belt. Please see the attached list of brownfield sites I think could be suitably redeveloped. Please take the notes attached to each individual site into account regarding the type and density of development I believe would be appropriate.

Q26. How should the management of Benfleet and Southend Marshes be approached in the Plan?

Expert advice should be sought on the matter with the aim of preserving and promoting local wildlife and the natural environment, whilst also maintaining any and all functions relating to the mitigation of local flood risk. Although part of the area is marked as Green Belt, as it is marshland inaccessible for many months of the year it should not be considered in calculations to determine the percentage of available Green Belt across the whole Borough allocated for development in each option of the plan.

Q27. What improvements should be made to the Hadleigh Castle Country Park area?

Improvements that enhance access and enjoyment for family-based outdoor recreation. This includes promoting learning about the unique history and environmental benefit of the area whilst preserving the local historical heritage of the area. I do not believe any of the farmland in the area should be considered for residential development.

Q28. What changes or improvements would you like to see in Hadleigh Town Centre?

I think the environment of the town centre needs to be improved and made more inviting to ensure it is an attractive destination for local residents and for potential customers travelling through it. Specifically, the Council should consult with residents and decide the future of the former Crown site in the town centre, and indeed work with residents, businesses and community groups to create and deliver a practical vision for the future of the whole 'island site' in the town centre.

Q29. What type of development would you support within the Hadleigh Central development cluster?

&

Q30. What type of development would you support within the Vic House Corner Roundabout development cluster?

&

Q31. What type of development would you support within the Hadleigh East development cluster?

&

Q32. What opportunities for improvements and development within the A13 corridor in Hadleigh are there?

&

Q33. Do you have any views about the potential Site Allocations in Hadleigh?

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The Council should prioritise protecting the Green Belt. Please see the attached list of brownfield sites I think could be suitably redeveloped. Please take the notes attached to each individual site into account regarding the type and density of development I believe would be appropriate.

Q34. What are your views on the issues that need to be addressed in Daws Heath within the Castle Point Plan? The biggest issue in Daws Heath is the inclusion of two Green Belt sites, the site north of Daws Heath Road and South of Daws Heath Road, into the options document identifying them for possible development, when myself and hundreds of residents campaigned hard against development on the sites and the Council just fought and won two appeals against developers over them! These sites should not be developed and when other potential Green Belt sites have been excluded as possible options I am sure many residents are confused and more than a little disheartened to see them being considered as development options.

Q35. Do you have any views about the potential Site Allocations in Daws Heath?

Please see the attached list of brownfield sites I think could be suitably redeveloped. Please take the notes attached to each individual site into account regarding the type and density of development I believe would be appropriate.

Q36. What are your views on the issues that need to be addressed in Thundersley within the Castle Point Plan?

The village feel of the area should be promoted and the town centre should be enhanced. The dire traffic issues along the Rayleigh Road around The Woodmans Arms and up to Rayleigh Weir needs to be addressed and the Common and surrounding area should be protected as a recreation space with immense utility for local residents.

Q37. What type of development would you support within the Kiln Rd development cluster?

&

Q38. What opportunities for improvements and development within the A13 corridor in Thundersley are there?

&

Q40. Do you have any views about the potential Site Allocations in Thundersley? The Council should prioritise protecting the Green Belt. Please see the attached list of brownfield sites I think could be suitably redeveloped. Please take the notes attached to each individual site into account regarding the type and density of development I believe would be appropriate.

Q41. What do you think the Castle Point Plan housing requirement need figure should be? Please select your preferred choice from the options below:

Other: 15 years rather than 20 years of the annual local housing need. Castle Point Borough Council does not need to submit a local plan that accommodates 20 years worth of development when the Government only mandates local authorities to find sites for 15 years worth of housing need.

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I am personally very dismayed that the Council failed to use the lower assessed housing need figure they contained in the local housing need report they released in December 2023 to defend against recent speculative planning applications and appeals on Green Belt. It would have seriously strengthened their case. I understand the Council does not want to run the risk of the report being legally challenged before the local plan examination, but by then there may well be very little Green Belt left worth defending if developers keep exploiting this legal weakness.

Q42. Please rank the following options in your order of preference for delivering the housing growth we need:

&

Q43. Do you have any comments on the implications of the Options (for development) opposite?

&

Q44. Do you have another preferred option, which may include a combination of the above, or alternative land sources?

&

Q46. What types of development could be considered as appropriate within the North West of Thundersley area?

I have issues with all of these options and indeed the level of need currently planned for that necessitates them as per my answer to the previous question. That notwithstanding, I would prefer the Council keep development within the existing urban area. However as previously mentioned, if the new Labour Government effectively force the Council to consider Green Belt for development, either allocating the area NW of Thundersley for residential development, or moving Manor Trading estate there and redeveloping that for residential use, should be the only Green Belt option considered. Even then, it would have to come with a new road access onto the A127 or Rayleigh Spur roundabout/ Fairglen interchange to improve the borough's access to the wider road network and not add further pressure to the already congested Rayleigh Weir and Sadlers Farm junctions.

Q45. What do you think about the sources of urban land identified, and how should they be managed if they are redeveloped, for example, should existing service capacity be retained on site or within the borough?

A large number of the brownfield sites identified as options for development are parts of key community infrastructure and should be removed as options at the earliest possible opportunity. These include a fire station, a police station, several supermarkets, large council owned town centre car parks, churches, two community halls, three libraries, health centres in Benfleet, Thundersley and Canvey and USP (formerly SEEVIC) College. Under no circumstances should these key pieces of community infrastructure be demolished in favour of residential development and I am frankly baffled at their inclusion in this consultation. The deliverability of all the brownfield sites will have to be determined before Councillors are presented with options for site selection, but I believe the deliverability, or at least the availability, of sites should have been determined before the public consultation. Residents will feel deceived if they take the time and effort to either support or oppose the inclusion of specific sites local to them for development in the plan if those sites never had a prospect of

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being delivered in the first place. It also opens up the Council to the very serious risk that Councillors may include brownfield sites that are not deliverable into their site selections in an attempt to preserve Green Belt sites and reflect residents' wishes, only to have their selections challenged at examination by developers looking to include their Green Belt sites for development instead. Undeliverable sites should be removed from consideration as soon as possible.

Q47. Please rank the following outcome options in your order of preference to show what you feel should be delivered alongside new housing in the Plan: &

Q48. Are there any other priorities not listed above which you feel should be delivered alongside new housing in the plan?

&

Q49. What benefits could justify increased density in new development in the borough? &

Q50. Are there any other benefits that you think it would be appropriate for higher density development to deliver?

I think all the options listed are important and hard for local residents to rank against each other. I think any other priorities or benefits listed by local residents should be given the utmost consideration.

Q81. Do you have any views on protecting and enhancing the borough's heritage assets as set out above?

Compared to most other districts, Castle Point has relatively few heritage assets and historical buildings given its long history of settlement dating back to Saxon times. Protection of what is left of the Borough's local heritage should be a key part of the local plan proposals. This should include heritage buildings from more recent history, including the Canvey Transport Museum, the Edwardian era façade of Hadleigh Old Fire Station, the façade of the old Canvey Island Urban District Council Offices on Long Road, and the historic farm and accommodation buildings on Hadleigh Farm

Q90. How do you feel the risk of flooding should be managed in new development?

I think it is important that any new development should have to prove its resilience to flood risk, but also a thorough assessment of any downstream implications for the capacity of existing flooding infrastructure needs to be undertaken. The true capacity of some local flood risk assets is unknown and many of the assets are insufficiently mapped or not mapped accurately. The true capacity of flood risk assets downstream from all development sites should be fully explored and mapped so that developers, the Council, and local residents, can be absolutely sure that the flood mitigation measures put in place will not strain enough on existing assets to increase flood risk elsewhere.

Q97. Would you support seeking a higher than 10% Biodiversity Net Gain requirement? &

Q98. Would you support the introduction of an Urban Greening Factor seeking to increase biodiversity in urban areas? Yes.



Q110. Which of the following active travel infrastructure improvements would you be in favour of?

All of them are important.

Q112. What type of road infrastructure needs to be improved over the Plan period? All the options listed are important but specific improvements to road access onto Canvey Island should be added as an option as well.

Q113. Which parts of the highway network should be prioritised for improvement? &

Q114. Are there any new transport routes that you feel should be introduced to provide better/quicker routes to ease congestion?

There are currently only three ways into and out of the Borough, via Sadlers Farm, Rayleigh Weir, or East on the A13 and residential roads to Southend. As detailed in previous answers, a third road access for Canvey Island should be the number one transport priority of the plan and the Council should restart work on the Canvey West Access Taskforce immediately. The Council should also seek to secure another access onto the A127 or the Rayleigh Spur roundabout to ease congestion on existing routes.

Q118. What do you think about the proposed parking standards?

You do not describe them in detail in the document so it's very hard for residents to answer this question! There should always be sufficient off-street parking for each development so local residential roads do not have to take the strain of extra parking from the development.

Q119. What measures would help to reduce the impacts of rat-running on unsuitable routes in the borough?

Although those options may help, the biggest thing that the new local plan could do to prevent 'rat running' on unsuitable roads is plan sensitively to minimise congestion on the main routes that residents attempt to avoid via rat running and actively allocate funds from local development to ensure they are improved.



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Site	Town	Location	Notes
101	CI	West of Venables Cl	
102	CI	56-65 High St (KFC)	Yes, limited flats above but commercial
103			underneath and with adequate parking
104	СІ	Cnr of Venables and High St	Yes, limited flats above but commercial
			underneath and with adequate parking
105	СІ	92-98 High St (Hook & Partners)	Yes, limited flats above but commercial
			underneath and with adequate parking
106	СІ	Cnr of Florence Rd and High St	Yes, limited flats above but commercial
			underneath and with adequate parking
107	СІ	High St Florence Rd - Oxford Rd	Yes, limited flats above but commercial
			underneath and with adequate parking
110	СІ	149-151 & RO	REMOVE CORNER CLUB,
			JUST DEVELOP REAR!
113	СІ	Knightswick	FLATS ABOVE SHOPPING
		Shopping Centre	CENTRE ONLY
118	CI	11-15 Knightswick Road	Yes, limited flats above but commercial
			underneath and with adequate parking
119	CI	14-18 Furtherwick Road	Yes, limited flats above but commercial
			underneath and with adequate parking
120	CI	59 Furtherwick Road (Kush)	Yes, limited flats above but commercial
			underneath and with adequate parking
123	CI	Jones Corner, 169-	Yes, limited flats above but commercial
		179 Long Road	underneath and with adequate parking
126	CI	The former King Canute Pub	Yes, limited flats above but commercial
			underneath and with adequate parking Yes, limited flats above but commercial
129	CI	353-365 Long Road (Cosmos)	underneath and with adequate parking
		Corner of Station Rd	Yes, limited flats above but commercial
133	CI	& High Rd	underneath and with adequate parking
		Ozonia Gardens,	Needs redevelopment as long as no residents
136	CI	Ozonia Gardens, Eastern Esp	are displaced
	СІ	Land between Station Rd & Seaview Rd	Yes, limited flats above but commercial
137			underneath and with adequate parking
	СІ	Essex Coachworks, 218 High Road	Yes, limited flats above but commercial
140			underneath and with adequate parking
4.40		Garages off St Johns	
143	CI	Crescent	
144	CI	Garages site off St	
1 1 7	0.	Agnes Drive	
202	SB	87-97 High St	Yes, limited flats above but commercial
			underneath and with adequate parking
212	SB	188 - 190 High Road	Yes, limited flats above but commercial
			underneath and with adequate parking

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213	SB	Stellisons, High Road	
220	ТН	NW cnr London Rd &	Yes, limited flats above but commercial
		Rushbottom Ln	underneath and with adequate parking
223	тн	159-169 Church	Yes, limited flats above but commercial
		Road	underneath and with adequate parking
225	ТН	Rear of 179-181 Church Road	
226	SB	L/a Villa Park, Tamarisk	Two story development, house/townhouse style. No dense development out of keeping with surrounding properties
228	тн	Canvey Supply, 223 London Road	
305	HD	24 High Street (Hadleigh Con Club)	
306	HD	351-359 London	Yes, limited flats above but commercial
		Road	underneath and with adequate parking
307	HD	Rear of 244-258	Yes, limited flats above but commercial
			underneath and with adequate parking
308	HD HD	Corner of Castle Rd & London Rd	Yes, limited flats above but commercial
		Magnet, London	underneath and with adequate parking
315		Road	Include extra parking for shops at Vic House Cnr
316	HD	Bus Depot, London Road	
317	HD	39-45 London Rd (Brooms)	
318	HD	Land South of Scrub Lane	Low Density ONLY, Ideal for supported living
401	TH	Thames Loose Leaf	
403	ТН	Council Offices	
405	TH	343 Rayleigh Road	
406	тн	Rayleigh Road Parade, Rayleigh Rd	Yes, limited flats above but commercial underneath and with adequate parking
407	тн	Halfords, 543-557 Rayleigh Rd	Yes, limited flats above but commercial underneath and with adequate parking
410		Land between Starling CI & Hacks Drive	