

Brentwood Borough Council response to the Epping Forest Draft Local Plan consultation | December 2016

Principle

1. Thank you for inviting Brentwood Borough Council to provide comments as part of Epping Forest District Council's consultation on its draft Local Plan consultation document. Brentwood Borough Council is a neighbouring local planning authority and there are a number of strategic issues, such as housing and infrastructure, which can be considered at levels greater than a single local planning authority area and which concern both Council areas. It is important that such issues are addressed through collaborative working and meaningful discussions in accordance with legislation, the National Planning Policy Framework (NPPF), and Planning Practice Guidance.
2. Please note that we have limited comments to high level strategic issues that potentially impact directly on Brentwood Borough. The comments on the plan are provided below.

Objectives and Vision

3. Generally, Brentwood Borough Council supports the draft plan, the strategic objectives and the high aspiration of the draft vision. The commitment to allocating locations for homes, employment and Traveller pitches, as well as the commitment to continue conservation of key strategic natural environmental locations and Green Infrastructure is welcomed and supported.

Housing Need and Delivery of Sites

4. Brentwood Borough Council notes the West Essex and East Hertfordshire Strategic Housing Market Area, Functional Economic Market Area, and Draft Memorandum of Understanding with respect to the distribution of objectively assessed needs across the area.
5. We have concerns regarding the long term allocation of sites for housing within the greater West Essex and East Hertfordshire Strategic Housing Market Area. We note the stated identified need for 46,100 homes to be delivered within the housing market area, updated to 54,600 (2016) and that this is in order to meet the requirement of the NPPF in the period from 2011 to 2033. We further note that it is recognised by Epping Forest District Council that 11,400 homes will need to be provided on sites identified in the Epping Forest Draft Local Plan, requiring an extent of the Green Belt to be amended. However, it is noted that local planning authorities within the housing market area take the view that when constraints are considered, the maximum amount of growth that could be

accommodated in the plan period is “around” 51,100 (for the entire housing market area). Therefore, we express concern that because Epping Forest District Council has not formally finalised the Memorandum of Understanding with other partners in housing market area, the exact allocation of the considered maximum growth of 51,100 new homes has not been set, nor is there agreement on where the shortfall can be met when constrained growth (51,100) is compared with identified objectively assessed housing need (54,600).

6. Brentwood Borough is in a similar position to Epping Forest District; a high proportion of the areas are within Green Belt and challenging development needs are to be met. On that basis, considering Brentwood Borough Council is doing all it can to meet local development needs, we are not in a position to meet any additional needs from adjoining areas. Subject to further consultation as the plan-making process progresses in Epping Forest and in other local authorities within the housing market area, Brentwood Borough Council reserves its right to object to the Epping Forest Local Plan if commitment to meet all identified development need is not made within the housing market area.

Travellers Need and Delivery of Pitches

7. Brentwood Borough Council notes that recent work on the evidence base relating to future needs for Gypsies, Travellers, and Travelling Showpeople has been assessed to be an additional eighteen pitches and one yard over the Local Plan period of 2011-2033 within Epping Forest District. We support the Draft Local Plan aims to address the full identified Gypsy, Traveller and Showpeople need over the life of the Plan. It is noted that the change in definition made through the Government’s Planning Policy for Traveller Sites may reduce overall need for travelling Travellers, but need will remain for those who are not travelling. As with overall housing needs, due to Brentwood Borough’s high proportion of Green Belt (over 89%), it is severely restricted in suitable and available sites for new pitches or transit site provision, and so is unable to meet the need of other areas.

Ongar

8. We note the proposals to expand Chipping Ongar and High Ongar, a short distance from the administrative boundary between Epping Forest District and Brentwood Borough. It is acknowledged that this is a significant increased proportion of new homes proposed for the village(s)/area(s) within the context of meeting challenging development needs in the most sustainable locations. We consider that growth in this area should be brought forward in a sympathetic manner, consistent with local character. The character of the north of Brentwood Borough is one of a series of connected villages, separated by countryside within the London Metropolitan Green Belt. This character is also true of this part of Epping Forest District, and so we are keen this is maintained, despite the need to grow. Brentwood Borough Council’s Draft Local Plan considered transport corridors, where development would be in close proximity to road and rail connections, to be the most sustainable locations for growth. The north of Brentwood Borough and its villages were not considered to be well connected enough to facilitate large amounts of growth. It is noted that Chipping Ongar is higher up in the settlement hierarchy for Epping Forest District than when

compared with Brentwood Borough's equivalent, in terms of existing size, range of local services, plus the A414 road linking to Chelmsford (to the east) and Harlow (to the west). It is noted that there is no nearby connected rail stations.

9. The arrival of a new Academy School in Ongar has also been the subject of ongoing conversations regarding the movement of people between Epping Forest District and Brentwood Borough (and vice-versa) for the purposes of travelling to school. We are keen that this situation continues to be monitored and that the subject remains a point of strategic cross-boundary importance for discussion.

Duty to Cooperate

10. Brentwood Borough Council welcomes the opportunity to continue to work with Epping Forest District Council in progressing the plan-making process of both areas on an ongoing basis in line with the requirements of the duty to cooperate.
