

28 June 2016

Planning and Licensing Committee

Response to Castle Point Borough Council New Local Plan 2016

Report of: *Phil Drane – Planning Policy Team Leader*

Wards Affected: *All Wards*

This report is: *Public*

1. Executive Summary

- 1.1 This report seeks Members agreement on a formal response to the Castle Point New Draft Local Plan consultation.
- 1.2 The proposed response sets out an objection on the basis that Castle Point Borough Council fail to meet the full objectively assessed housing needs for their borough. No information is provided as to where the shortfall of new homes or pitches could be placed, either within the Thames Gateway South Essex housing market area or in adjoining areas, such as Brentwood Borough.
- 1.3 Both Councils have a “duty to cooperate” on planning issues that cross administrative boundaries, particularly strategic priorities between housing market areas.

2. Recommendation

- 2.1 To approve the response to the Castle Point draft New Local Plan as set out in Appendix A.**

3. Introduction and Background

- 3.1 Castle Point Borough Council is holding a public consultation on a draft New Local Plan for six weeks between 16 May and 30 June 2016. The Castle Point New Local Plan is now a late stage development plan (Regulation 19), which details a strategic overview of development, site specific proposals, and the planning policies to manage development

within Castle Point Borough. In time this will replace the current Castle Point Local Plan (1998).

- 3.2 Brentwood Borough Council is duty bound to co-operate with local planning authorities within neighbouring housing market areas where cross-boundary issues have been raised. It is recommended that the Council submit a response to the draft plan consultation, although this has been limited to comments on high level strategic issues that may impact Brentwood Borough.

4. Issue, Options and Analysis of Options

- 4.1 The National Planning Policy Framework requires each local planning authority to produce a Local Plan. This should set out strategic priorities for the area and plan positively for development and infrastructure needs in line with national policy and guidance.

- 4.2 This includes strategic policies to deliver:

- homes and jobs needed in the area;
- provision of retail, leisure, and other commercial development;
- provision of infrastructure for transport, telecommunications, water supply, waste water, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

- 4.3 The Castle Point draft New Local Plan aims to:

- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and

- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.
- 4.4 The Castle Point draft New Local Plan intends to set out a comprehensive approach which incorporates the spatial strategy for Castle Point Borough with strategic policies and 120 detailed planning policies, including the allocation of land for housing.
- 4.5 The needs of Gypsies, Travellers, and Travelling Showpeople is considered by a policy within the Castle Point draft New Local Plan and not as a separate document. There is no land specifically allocated for Gypsy, Traveller or Showpeople pitches within the draft New Local Plan.
- 4.6 As well as published evidence base, the Castle Point draft New Local Plan is accompanied by key supporting documents:
- sustainability appraisal;
 - habitat regulations assessment;
 - equalities impact assessment;
 - proposals map; and
 - constraints map.
- 4.7 The Castle Point draft New Local Plan has been drawn up to cover the period 2014 to 2034.

5. Reasons for Recommendation

- 5.1 Castle Point has an objectively assessed housing need of between 326 and 410 new homes per annum (Thames Gateway South Essex Strategic Housing Market Assessment, May 2016). This is within a strategic housing market area that includes the boroughs of Basildon, Castle Point, Rochford, Southend-on Sea and Thurrock. Castle Point is proposing to meet a need of only 107 new homes per annum. The Castle Point draft New Local Plan states that this figure “reflects the capacity of the borough to accommodate growth”.
- 5.2 Furthermore, the Castle Point draft New Local Plan provides no information as to where the shortfall of new homes or pitches could be placed, either within the housing market area or adjoining areas. Brentwood Borough adjoins the Thames Gateway South Essex housing market area.
- 5.3 89% of Brentwood Borough’s total land area is designated as Green Belt, which severely restricts options for new development. In order to meet

the identified objectively assessed needs of Brentwood Borough the Council is proposing limited release of Green Belt, potentially reducing Green Belt coverage in the Borough (Brentwood Draft Local Plan, January 2016). This is in order to meet local needs locally, despite Green Belt and infrastructure constraints. The possibility of adding the unmet needs of Castle Point Borough, due to their proposed low annual target of 107 new homes to Brentwood Borough, is unreasonable and is unjustified.

- 5.4 Brentwood Borough is constrained, restricting suitable and available sites for new homes, pitches or transit site provision. For this reason Brentwood Borough Council is unable to accommodate the unmet needs of surrounding districts and object to the Castle Point draft New Local Plan on this premise.

6. Consultation

- 6.1 The Castle Point draft New Local Plan is available for public consultation between 16 May and 30 June 2016. The proposed response is brought to Members to consider before the consultation deadline so that an approved response is submitted on behalf of Brentwood Borough Council.

7. References to Vision for Brentwood 2016-19

- 7.1 The Castle Point draft New Local Plan is relevant to the Thames Gateway South Essex housing market area, and this housing market area will have a relationship with the emerging Brentwood Local Development Plan. Production of the Local Development Plan is a key priority in the Council's corporate plan Vision for Brentwood 2016-19.

8. Implications

Financial Implications

Name/Title: Ramesh Prashar, Financial Services Manager
Tel/Email: 01277 312542 ramesh.prashar@brentwood.gov.uk

- 8.1 No financial implications directly arising from this report.

Legal Implications

Name/Title: Saleem Chughtai, Legal Services Manager
Tel/Email: 01277 312860 saleem.chughtai@bdtlegal.org.uk

- 8.2 The Council is required through the Duty to Cooperate to engage with the plan-making process of local planning authorities in neighbouring housing market areas where cross-boundary issues have been raised. The duty requires the Council to engage constructively, actively and on an ongoing basis. The Castle Point draft New Local Plan will be examined by an

independent inspector whose role is assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound.

9. Background Papers

- 9.1 Castle Point Borough Council Draft New Local Plan (May 2016)
- 9.2 Brentwood Borough Council Draft Local Plan 2013-2033 (January 2016)

10. Appendices to this report

- 10.1 Appendix A: Brentwood Borough Council Response to the Castle Point New Local Plan Consultation (June 2016)

Report Author Contact Details:

Name: Jill Warren, Senior Policy Planner
Telephone: 01277 312609
E-mail: jill.warren@brentwood.gov.uk