

# Brentwood Borough Council response to: Epping Forest Local Plan Submission Version (2017) January 2018

# **Principle**

- Thank you for inviting Brentwood Borough Council to provide comments as part of the Epping Forest District Council's Local Plan Pre-Submission Publication (Regulation 19). 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 concerns 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 (PPG).
- 2. Please note that we have limited our comments to addressing the strategic planning matters which affect both our areas and comments on the soundness of the plan, and duty to cooperate as required at the Regulation 19 stage of the plan making process.

#### **Strategic Planning Matters**

3. Epping Forest District Council and Brentwood Borough Council share a number of strategic planning matters such as housing and infrastructure. We note that development is planned for Ongar, which borders between the Epping Forest and Brentwood administrative boundaries. Brentwood is in support of Epping Forest's Plan to meet their housing need over the plan period, and are therefore in general support of the development. Continued engagement will be required following the adoption of the Epping Forest Local Plan, particularly around infrastructure, schools, and GP surgeries in the Ongar area due to its close proximity to Brentwood Borough.

### Soundness

4. Epping Forest shares a housing market area with three other districts - East Herts, Harlow, and Uttlesford. The four districts have finalised and signed a Memorandum of Understanding (MoU) in regard to the housing requirements where the West Essex & East Herts housing market area authorities have committed to meeting their housing needs. Brentwood Borough supports this approach. However, we do note that Epping Forest District Council will not be meeting their five-year housing supply. The Epping Forest Plan states that "if the Authority Monitoring Report (AMR) demonstrates that annual housing delivery is less than 75% of the annualised requirement or the projected completion rate (whichever is lower) for three consecutive years, the Council will undertake a partial review of the Plan". Further concern is raised as to whether Epping Forest District can meet their housing need as set out in the Plan and SHMA. Local plans are required to be reviewed every five years. Therefore, the above

sentence would not be required unless there were concerns that the housing delivery targets could not be met.

- 5. Development is proposed in the eastern parts of Epping Forest District in Ongar for 590 new homes. The additional home in Ongar need to provide supporting local community infrastructure facilities to lessen any burden on nearby villages within the 'rural north' area of Brentwood. Brentwood would welcome joint working with Epping Forest to discuss this further through duty to cooperate.
- 6. According to the Epping Forest Plan, the district will be providing 10,800 new jobs over the plan period (2011-2033). It goes on to further state that 7,900 new jobs will be provided between 2016-2033. However, it is not clear in the plan if the remaining 2,900 jobs have already been provided for between 2011-2016.

# **Duty to Cooperate**

- 7. It is noted that Officers responded to the Epping Forest Local Plan publication to meet the deadline. This response is subject to the approval of Members at the next available Planning & Licensing Committee. We would like to thank Epping Forest for allowing this approval to take place after the deadline. It is noted that although Epping Forest District Council allowed for representations to be made for the statutory six-week period, given this time fell over the Christmas and New Year's bank holidays, additional time for representations could have been permitted.
- 8. Brentwood Borough Council welcomes the opportunity to continue to work with Epping Forest District Council in progressing the plan-making process of both area on an ongoing basis in line with the requirements of the duty to cooperate.

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