

17 July 2018

Planning and Licensing Committee

Response to Castle Point Borough Council Local Plan Public Consultation 2018

Report of: *Phil Drane, Director of Strategic Planning*

Wards Affected: *All*

This report is: *Public*

1. Executive Summary

1.1 This report seeks approval to respond to Castle Point Borough Council's Local Plan public consultation (July 2018).

1.2 The proposed response on behalf of Brentwood Borough Council supports steps being taken by Castle Point Borough Council to prepare a Local Plan. The consultation is not supported by a draft document or proposals, rather views are sought on what the content for the Castle Point Local Plan should be. In light of this limited information, it is proposed that clarification be provided through the Castle Point plan-making process about the strategy for meeting Objectively Assessed Needs in Castle Point Borough over the 5-10 year timeframe planned for the housing policies and allocations.

1.3 Both Brentwood Borough Council and Castle Point Borough Council are partners in the Association of South Essex Local Authorities (ASELA). Both authorities have approved the ASELA Statement of Common Ground, which includes a commitment to joint working through the preparation of a Joint Strategic Plan for the sub-region. The Castle Point Local Plan will be prepared within the context of the South Essex Joint Strategic Plan.

2. Recommendation

2.1 To approve the response to the Castle Point Borough Council Local Plan public consultation (July 2018), as set out in Appendix A.

3. Introduction and Background

- 3.1 The National Planning Policy Framework (NPPF) 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.
- 3.2 Local Plans should include strategic policies to deliver:
- a) Homes and employment needed in the area;
 - b) Provision of retail, leisure, and other commercial development;
 - c) 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);
 - d) Provision of health, security, community and cultural infrastructure and other local facilities; and
 - e) Climate change mitigation and adaption, conservation and enhancement of the natural and historic environment, including landscape.
- 3.3 In June 2018 Castle Point Borough Council resolved to start work on a new Local Plan. This new Plan will draw upon previous evidence and public consultation responses received from the 2014 and 2016 versions. Therefore, Brentwood Borough Council's previous representations to the Castle Point Local Plan in 2014 and 2016 will be taken into consideration as part of this new consultation process.
- 3.4 In 2016 Castle Point Borough Council published their Local Plan and subsequently submitted it for Examination in Public. Brentwood Borough Council objected to the Castle Point Local Plan, primarily because it failed to meet the full objectively assessed housing needs of the area and without confirmation of whether the shortfall would be delivered within the South Essex housing market (Item No. 76, Planning and Licensing Committee, 28 June 2016). The Council's June 2016 response can be viewed in Appendix B.
- 3.5 The 2016 Castle Point Local Plan was withdrawn after it was found to not adhere to the Duty to Cooperate by the Planning Inspector appointed to examine the plan.
- 3.6 In November 2017, Castle Point Borough Council received a letter from the Secretary of State threatening Government intervention, alongside 14 other local authorities including Brentwood Borough Council. In March 2018 the Secretary of State notified Castle Point that the Government

would intervene in their plan-making process. Since then the Council has been encouraged by the Ministry of Housing and Local Communities to proceed with their local plan and are receiving assistance from Essex County Council.

3.7 Castle Point Borough Council are partners in the Association of South Essex Local Authorities (ASELA), alongside Brentwood Borough Council. The Council has approved the ASELA Statement of Common Ground, which includes agreement to produce a Joint Strategic Plan for South Essex

4. Issues, Options and Analysis of Options

4.1 A Draft Local Plan document has not been prepared for this consultation. Instead Castle Point Borough Council is seeking views about what the new plan should contain. A “Technical Evidence: Summary Document” (June 2018) has been prepared to inform the consultation, which sets out that the new Castle Point Local Plan will have a timeframe of at least 15 years. However, the housing delivery policies and site allocations will have a shorter timeframe of between 5 to 10 years. This shorter timeframe for housing policy elements is expected to result in an upturn in the delivery of housing in the short term. In the longer term, the South Essex Joint Strategic Plan is expected to pick up any unmet housing need to support the aims of the South Essex 2050 vision.

4.2 This consultation is at Regulation 18 stage according to the Town and Country Planning Regulations 2012 (issues consultations or early stages). According to the Castle Point Local Development Scheme, Regulation 19 (publication) consultation will take place in January 2019 and adoption is anticipated in Summer 2019.

4.3 Castle Point Borough Council are currently evaluating the aims of the 2016 Local Plan, to assist with the development on the 2018 Local Plan. The aims of the 2018 Local Plan are:

- a) To co-operation with neighbouring authorities, public, voluntary and private sector organisations; and
- b) Indicate broad locations for possible strategic development on key diagram and land-use designations on the proposal maps as outline within the 2014 and 2016 plans (however, there is no indication as to which sites are likely to come forward or number of new homes proposed for the 2018 Local Plan).

- 4.4 The evidence base from the 2014 and 2016 has been updated to inform preparation of the 2018 Local Plan. This includes:
- a) Strategic Housing Land Availability Assessment and Brownfield Land Register 2018;
 - b) Essex Coast Recreational disturbance Avoidance and Mitigation Strategy;
 - c) Essex Design Guide;
 - d) Community Infrastructure Needs Assessment;
 - e) Green Belt Review;
 - f) Green Infrastructure Strategy and Open Space Strategy;
 - g) Playing Pitch Strategy;
 - h) Sport and Leisure Facilities Needs Assessment;
 - i) Sustainability Appraisal;
 - j) Strategic Flood Risk Assessment;
 - k) Transport Assessment Update: and
 - l) Whole Plan Viability Assessment.
- 4.5 A Housing Sites Option Paper will be used to inform the New Local Plan. It is expected that the evidence used to develop this topic paper will be published in November 2018.

5 Reason for Recommendation

- 5.1 Castle Point Borough has an objectively assessed housing need of 311 new homes per annum, between 2014-2037, within the South Essex housing market area (Thames Gateway South Essex Strategic Housing Market Assessment Addendum, May 2017). This figure was determined using the 2014 updated population figures. To reflect the increased number of newly forming households anticipated under the updated demographic projection, the new net annual affordable housing need is 353 new homes over the 2014-2037 period.
- 5.2 Castle Point Borough Council has identified potential sites to meet this need as part work published in 2014 and 2016. However, the housing sites option paper and related evidence has yet to be published. Therefore, it is unclear whether the Castle Point Local Plan will meet the borough's required needs over the 5-10-year period of the plan and prior to the adoption of the Joint Strategic Plan.
- 5.3 Due to the limited information available during this consultation, the proposed Brentwood Borough Council response agrees that further

consultation should take place once the housing topic paper and related evidence base has been published to allow adequate opportunity to respond to the proposed strategy in Castle Point. The proposed response on behalf of Brentwood Borough Council is set out in Appendix A.

6. Consultation

- 6.1 The Castle Point Local Plan public consultation 2018 runs for six weeks between 4 July and 15 August 2018.

7. References to Corporate Plan

- 7.1 The Castle Point Local Plan 2018 is relevant to the Thames Gateway South Essex housing market area, and the South Essex Joint Strategic Plan. Both have a relationship with the emerging Brentwood Local Development Plan, the production which is a key priority in the Council's Vision for Brentwood 2016-2019. Joint aims to deliver South Essex 2050 aims in regard to major development and infrastructure also relate to priorities within the Vision for Brentwood 2016-2019 corporate plan.

8. Implications

Financial Implications

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- 8.1 None directly arising from this report.

Legal Implications

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- 8.2 The Localism Act 2011 places a legal duty on local planning authorities and other defined local bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. It is not a duty to agree, but local planning authorities must make every effort to secure the necessary cooperation before they submit their Local Plan for examination. The cooperation should produce effective and deliverable policies on strategic cross boundary issues.

Other Implications (where significant) – i.e. Health and Safety, Asset Management, Equality and Diversity, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

8.3 Joint working will continue between Brentwood Borough Council and Castle Point Borough Council, both partners in the Association of South East Local Authorities (ASELA).

9. Background Papers

9.1 Castle Point Borough Council, letter to all residents and businesses, Regulation 18 (July 2018)

9.2 Castle Point Borough Council, Technical Evidence: Summary Document (June 2018)

9.3 The above documents and other supporting information can be viewed on the Castle Point Borough Council website at <https://www.castlepoint.gov.uk/2018-local-plan-consultation>.

10. Appendices to this report

10.1 Appendix A: Brentwood Borough Council Response to Castle Point Local Plan Public Consultation 2018

10.2 Appendix B: Brentwood Borough Council Response to Castle Point Draft New Local Plan 2016

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