



**BRENTWOOD
BOROUGH COUNCIL**

Planning Policy
Castle Point Borough Council
Kiln Road,
Thundersley
Benfleet
Essex
SS7 1TF

Date: 30 June 2016
Our reference: CSPT/DTC/01
Your reference: -

Dear Planning Policy Team,

Holding Response to: Castle Point New Local Plan 2016

Please accept this letter as the response from Brentwood Borough Council in relation to the consultation on the Castle Point New Local Plan 2016 consultation document.

Thank you for inviting Brentwood Borough Council to provide comments as part of Castle Point Borough Council's consultation on its draft Local Plan Consultation Document. Brentwood Borough Council is an Essex local planning authority (LPA) near to Castle Point Borough Council and there are a number of strategic issues, such as housing and infrastructure, which can be considered at levels greater than a single LPA area and which concern both Boroughs. 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 the Planning Practice Guidance.

Please note that Brentwood Borough Council have limited their comments to high level strategic issues that impact directly on Brentwood Borough Council. The comments on the plan are given below.

Generally, Brentwood Borough Council supports the Vision for the Future within the New Local Plan 2016 and support the aspiration of the Objectives of the New Local Plan.

Brentwood Borough Council note the identified objectively assessed housing needs range of 326 to 410 new homes per annum (as a policy off scenario), as set out in the Thames Gateway South Essex Strategic Housing Market Assessment (2016) and required to be identified in the NPPF. Castle Point consider the lower end to be appropriate as the plan seeks to achieve a relatively modest level of employment growth. A figure of 400 homes per annum, giving 8,000 homes for the period of 2011 to 2031 has been identified.

However, we note that Castle Point Borough Council is not intending to meet this need and are proposing a target of 107 homes per annum, a total of 2,140 homes for the period 2011 to 2031, "reflecting the capacity of the borough to accommodate growth" and having

regard to the constraints of Green Belt strategic corridors, the natural environment and flooding. Brentwood Borough Council wishes to express concern that this approach is not inline with the requirements of the NPPF as it does not identify sites sufficient to provide the five year supply of housing to meet its objectively assessed need and accordingly may result in an increase in development pressure on other boroughs.

We also express concern that Castle Point Borough Council has not confirmed that the Borough is aiming to meet its full identified housing development need within the borough and that no detail has been provided regarding where the outstanding need can be met. Brentwood Borough Council therefore object to the Castle Point draft New Local Plan.

Brentwood Borough is not able to meet development needs of other surrounding boroughs, as Brentwood lies entirely within the Metropolitan Green Belt, with 89% of the borough currently being designated Green Belt. However, Brentwood Borough Council has made a commitment through preparation of its own Local Plan to meet local needs in full despite several constraining factors. Brentwood Borough Council will continue to object to the Castle Point Borough New Local Plan 2016 on this basis if commitment to meet all identified development need is not made, without providing identification of where this can be met.

Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment, (ORS, 2014) identifies a need for 5 additional Gypsy and Traveller and Travelling Showpeople pitches within the period of the Castle Point New Local Plan 2016. Whilst it is acknowledged that this is a small number, the new sites should be identified within the New Castle Point Local Plan 2016 as without this information the Plan is contrary to the requirements of the NPPF and the Planning Policy for Traveller Sites, DCLG August 2015.

Duty to Cooperate

Brentwood Borough Council welcomes the opportunity to continue to work with Castle Point Borough Council and partners in the Thames Gateway South Essex housing market area so that local plans can be progressed on an ongoing basis and in line with the duty to cooperate.

Please contact me if you would like to discuss the above consultation response further.

Yours sincerely

Phil Drane
Planning Policy Team Leader

Telephone: 01277 312610
Email: phil.drane@brentwood.gov.uk