

## **Brentwood Borough Council Response to the Basildon Borough Revised Publication Local Plan 2014-2034 (October 2018)**

Thank you for inviting Brentwood Borough Council to provide comments as part of Basildon Borough Council's consultation on its Revised Publication Local Plan. Brentwood Borough Council is a neighbouring local planning authority and there are several strategic issues, such as housing provision and infrastructure, which can be considered at levels higher than a single area concerning both boroughs. It is important that such issues are addressed through collaborative working and meaningful discussions in accordance with legislation, NPPF and planning practice guidance.

Brentwood Borough Council has limited comments to high level strategic issues that impact directly on Brentwood Borough and/or where it is considered that some resolution is required.

### **Housing Provision**

Concern is raised that the housing provision identified in the Revised Publication Local Plan is some 1,980 homes short of the upper range of objectively assessed housing need (19,771 homes). It is noted that the objectively assessed housing need range is broadly consistent with the Standard Method.

Concern is raised that the minimum housing target specified in the plan according to what is considered deliverable, at 15,465 homes, falls short of the of the upper identified housing need figure by 4,306 homes.

It is noted that Policy SD1 refers to the South Essex Joint Strategic Plan (JSP) to help meet unmet housing need in Basildon Borough. As an ASELA partner, Brentwood Borough Council understands the benefit that joint working to publish a strategic plan will provide when it comes to infrastructure investment to unlock growth. However, the JSP should be in place to unlock growth over and above locally identified needs. The JSP is at an early stage. Concern is raised regarding the reliance on the JSP and the review mechanism that may be required if the Basildon Local Plan is not able to deliver new homes in the longer-term against need.

It is noted that Policy SD2 identifies two broad locations in the plan that could unlock capacity in the longer term within Basildon Borough and through the JSP. This proposal would contribute to local needs being met within Basildon Borough during the plan period. However, those needs would still not be met in full and the sites require infrastructure investment that would be dependent on the JSP.

As a neighbouring local planning authority and fellow partner in ASELA, Brentwood Borough Council requests that the issue of how to meet unmet housing need in Basildon Borough forms part of further discussion through the duty to cooperate. This issue is unresolved, and it is proposed that this forms part of a Statement of Common Ground between the authorities. This will enable dialogue to take place on how to resolve the issue, which will likely include joint working as part of preparing the JSP. Until this issue is resolved Brentwood Borough Council reserves the right to object to the Basildon Borough Revised Publication Local Plan 2014-2034.

### **Gypsy, Traveller and Travelling Showpeople Accommodation**

Concern is raised that the Revised Publication Local Plan does not meet Basildon Borough's Gypsy and Traveller needs. The plan proposes to meet unmet need through the Duty to Cooperate and partnership working in the JSP, as set out in Policy H3. Identified broad locations that are not allocated for development but could be brought forward within the plan period subject to infrastructure investment through the JSP (Policy SD2) could contribute to unmet Gypsy, Traveller and Travelling Showpeople need.

Concern is raised regarding the reliance on the JSP and the review mechanism that may be required if the Basildon Local Plan is not able to deliver new homes in the longer-term against need.

As a neighbouring local planning authority and fellow partner in ASELA, Brentwood Borough Council requests that the issue of how to meet unmet Gypsy, Traveller and Travelling Showpeople need in Basildon Borough forms part of further discussion through the duty to cooperate. This issue is unresolved, and it is proposed that this forms part of a Statement of Common Ground between the authorities. This will enable dialogue to take place on how to resolve the issue, which will likely include joint working as part of preparing the JSP. Until this issue is resolved Brentwood Borough Council reserves the right to object to the Basildon Borough Revised Publication Local Plan 2014-2034.

### **Economic Growth**

Support is expressed for Policy E3, safeguarding the Ford site at Dunton for employment purposes. It is noted that Brentwood and Basildon Boroughs share employment sites that host the Ford Motor Company. It is noted that Ford recently announced a consultation regarding the potential to move from its Warley offices in Brentwood Borough, and providing jobs at Dunton, in Basildon Borough (4.5 miles away and within South Essex). This is consistent with the redevelopment potential of the wider Warley site, allocated in the Brentwood Borough Pre-Submission Local Plan (October 2018).

Brentwood Borough Council support the safeguarding of employment land at Dunton for automotive research and development purposes and welcome the investment that Ford would put into Dunton with a commitment to stay in South Essex.

Employment and economic growth in the area is important for the South Essex economy.

In addition, Brentwood Borough Council support the Revised Publication Local Plan aim to achieve economic growth in the A127 Corridor. This should be in combination with other schemes for economic growth in the wider area, such as that through Dunton Hills Garden Village and Brentwood Enterprise Park.

It is suggested that the issue of economic growth, geographic connections between Brentwood and Basildon boroughs, and specific sites mentioned in this response, form the basis of further joint working.

### **Duty to Cooperate and the South Essex Joint Strategic Plan**

Brentwood Borough Council welcomes the opportunity to continue to work with Basildon Borough Council in progressing the plan-making process on an ongoing basis in line with the duty to cooperate. Good progress has been made in discussion between the two authorities, including joint working and partnership through ASELA. Both authorities have embraced opportunities to work together in the preparation of our respective local plans in line with the duty to cooperate. 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 South Essex.

It is proposed that a Statement of Common Ground(s) be prepared to identify cross-boundary issues and set out a path to resolution on cross-boundary issues identified.

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