

## **Brentwood Borough Council response to the Castle Point Pre-Submission Local Plan (Regulation 19)**

January 2020

### **Principle**

1. Thank you for inviting Brentwood Borough Council to provide comments as part of Castle Point Borough Council's consultation on its Pre-Submission Local Plan Public Consultation 2019/20. We support the steps that Castle Point Borough Council has made to proceed with preparation of a Local Plan. There are several strategic issues, such as housing and infrastructure, which can be considered at levels greater than a single local planning authority 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.
2. Please note that we have limited our response to high level comments addressing the strategic planning matters which affect both our areas.

### **Housing Need**

4. Brentwood Borough Council notes the proposal for the Castle Point Local Plan to have a 15-year period and intends to meet the borough's objectively assessed housing need. We welcome the steps taken by Castle Point Borough Council to meet its objectively assessed housing need. However, we seek clarification on how the figures in Table 9.1 'Housing Trajectory' were calculated. Concerns are also raised as to the methodology used for meeting the housing needs. There appears to be an over reliance on extant planning permissions and the Brownfield Land Register, which is identified as being able to provide 50% of the borough's housing needs.
5. The affordable housing policies seek 40% affordable housing from all developments in Benfleet, Thundersley, and Hadleigh, 15% for flatted developments and 25% for non-flatted developments on Canvey Island for developments under 100 units, and 40% for all development over 100 dwellings. This approach is supported in terms of increasing the level of affordable housing amongst a mix of tenures and housing types.

## **Employment and Town Centres**

6. Brentwood Borough Council supports Castle Point Local Plan policies on meeting employment needs within the borough, which seeks to protect 24 hectares of employment land for B-Use Class and develop 1 hectare of new employment land to meet the borough's employment needs. It is expected that this will provide 462 new jobs within Castle Point. This approach is supported as part of wider economic growth aims in South Essex.
7. The Castle Point Local Plan also seeks to protect local town centre's by restricting residential development within high streets, and through planned regeneration of Hadleigh and Canvey Island Town Centre's. This approach is supported as part of wider economic growth aims in South Essex.

## **Healthy and Safe Communities**

8. Brentwood Borough Council welcomes the inclusion of the 'Healthy and Safe Communities' chapter in the Pre-Submission Local Plan. It is suggested that a separate Health Impact Assessment policy be included in the Local Plan to strengthen the existing policies and further reinforce the objectives of the Essex Planning Officers Association's (EPOA) guidance on Health Impact Assessment.

## **Duty to Cooperate**

9. As part of our joint working and combined commitment through the Association of South Essex Local Authorities, Brentwood Borough Council will continue to work with Castle Point Borough Council on the strategic aims of the area through preparation of the Joint Strategic Plan. We welcome the opportunity to continue to work closely with Castle Point Borough Council through the duty to cooperate for both the preparation of our individual local plans.

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