



## PLANNING COMMITTEE

20 FEBRUARY 2024

<b>REPORT TITLE:</b>	Response to the Thurrock Local Plan, Initial Proposals (Regulation 18) Consultation
<b>REPORT OF:</b>	Jonathan Quilter, Corporate Manager – Strategic Planning
<b>REPORT IS FOR:</b>	Decision
<b>WARDS:</b>	All

### REPORT SUMMARY

This report seeks approval of a formal response from Brentwood Borough Council to the Thurrock Local Plan, Initial Proposals (Regulation 18) consultation. The consultation ran from 18 December 2023 and closed on 19 February 2024.

The response conveys broad support of Thurrock Council's aims in preparing a new Local Plan. The Council expresses concerns regarding the limited engagement that has taken place with neighbouring authorities, such as Brentwood Borough Council, and lack of information on how Thurrock plans to meet their development needs.

Thurrock Council has identified that their housing need is 23,320 new homes and has an ambition to provide 27,000 new jobs. The consultation document outlines various opportunity areas but does not include specific sites. Instead, the consultation document outlines six possible spatial options for delivering new homes, which include the amount of new homes that could be delivered without any green belt release (resulting in approximately 7,300 new homes) and other high density option with green belt release that could result in approximately 39,800 new homes. It is clear that Thurrock are dependent on a large strategic allocation to come forward at West Horndon in order to meet their housing needs. The Council has raised an objection, on the basis that there is too much uncertainty around the full extent of the proposal, lack of evidence to support the proposal, and potential impacts to Dunton Hills Garden Village. In addition, the consultation document identified a need for an additional 75 new gypsy and traveller pitches and 7 new travelling showperson plots, but no further information is provided on how these needs will be met.

The consultation document does not set out specific policies but does state the intentions to require new developments to achieve net zero homes, 35% affordable housing provision, and deliver 20% biodiversity net gains.

## **RECOMMENDATION**

**Approve the response to the Thurrock Local Plan, Initial Proposals (Regulation 18) as set out in Appendix A**

### **SUPPORTING INFORMATION**

#### **1.0 REASON FOR RECOMMENDATION**

- 1.1 Thurrock Council is currently working towards a new Local Plan, with a possible Plan period of 20 years. The consultation document outlines high level initial proposals and opportunity areas and does not include specific draft policies or identification of sites. The consultation ran from 18 December 2023 until 19 February 2024.
- 1.2 Brentwood Borough Council is duty bound to undergo the duty to cooperate with neighbouring authorities on preparation of their local plans. In addition to being a neighbouring authority, both Thurrock and Brentwood are members of the South Essex Councils (SEC; previously referred to as the Association of South Essex Local Authorities ASELA), and therefore ongoing joint working and discussion on cross-boundary planning matters, such as unmet housing needs, is discussed as part of the preparation of the South Essex Joint Strategic Framework.
- 1.3 Despite the joint partnership in SEC, no formal duty to cooperate meetings had taken place prior to the launch of the Thurrock Local Plan, Initial Proposals consultation in December 2023. As both councils are duty bound to undergo the duty to cooperate, Brentwood has raised concerns that no prior engagement had taken place and has requested regular and more effective engagement moving forward.

#### **Issues, Options and Analysis of Options:**

- 1.4 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 link with national policy and guidance.
- 1.5 Local plans should include strategic policies to deliver:
- a. Home and employment needed in the area;
  - b. Provision for 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 adoption, conservation and enhancement of natural and historical environment, including landscape.

- 1.6 The Thurrock Local Plan is at the early stages of the plan-making process. The current consultation document sets out a draft vision, high level strategies, and six possible growth options.
- 1.7 The document does not set out specific sites, but rather identifies all possible growth opportunities. The site assessment work for these sites is currently ongoing.

### **Thurrock Local Plan, Growth Options**

- 1.8 Thurrock's housing needs, as identified housing needs is 23,320 new homes, 77 new gypsy and traveller pitches, 7 travelling showperson plots, and an ambition for 27,000 new jobs.
- 1.9 The consultation document does not specifically identify sites, rather sets out strategic growth options. These are:
  - **Option 1:** Focus on locations that are currently the most connected. This option would include existing commitments and brownfield sites in the urban area; high growth in settlements with good connectivity by rail and bus; an urban extension at West Horndon; and low growth in all other areas. This option would generate approximately 31,300 new homes with associated supporting infrastructure.
  - **Option 2:** Increased development in locations that have direct access to key services and facilities. This option would include existing commitments and brownfield sites in the urban area; high growth in settlements with good connectivity / access to essential social infrastructure; and low growth in all other areas. This option would generate approximately 39,800 new homes with associated supporting infrastructure.
  - **Option 3:** Increase development in the smaller villages. This option would include existing commitments and brownfield sites in the urban area; high growth in the rural villages; low growth at West Horndon; and medium growth in all other areas. This option would generate approximately 32,000 new homes and associated supporting infrastructure.
  - **Option 4:** New settlement at West Horndon. This option would include existing commitments and brownfield sites in the urban area; a new settlement in West Horndon; medium / low growth in well-connected areas; and low growth in all other areas. This option would generate approximately 31,000 new homes with associated supporting infrastructure.
  - **Option 5:** New settlement at West Horndon and Lower Langdon. This option would include existing commitments and brownfield sites in the urban area; new settlements at West Horndon and Lower Langdon; a low growth in all other areas. This option would generate approximately 24,200 new homes with associated supporting infrastructure.
  - **Option 6:** No additional green belt release. This option would include all existing commitments, windfall sites and potential opportunity areas and would generate approximately 7,300 new homes.

- 1.10 In addition to the above growth options, the Thurrock Local Plan consultation document outlined requirements for all new developments to provide net zero energy, provide 35% affordable housing, and 20% biodiversity net gain.

## **2.0 BACKGROUND INFORMATION**

- 2.1 Thurrock has had various Regulation 18 consultations on their developing Local Plan. It is the intention of Thurrock Borough Council to progress to a Regulation 19 by winter 2024 and submit their Local Plan to the secretary of state in early 2025.

## **3.0 OTHER OPTIONS CONSIDERED**

- 3.1 None.

## **4.0 RELEVANT RISKS**

- 4.1 None.

## **5.0 ENGAGEMENT/CONSULTATION**

- 5.1 Brentwood Borough Council is duty bound to undergo the duty to cooperate with neighbouring authorities on preparation of their local plans.
- 5.2 Thurrock is within the neighbouring South Essex housing market area, and both Brentwood and Thurrock are members of the South Essex Council's. There has been ongoing joint working and discussion on cross-boundary planning matters, such as unmet housing need, through the SEC partnership and part of the preparation of the South Essex Joint Strategic Framework.
- 5.3 The Thurrock Local Plan, Initial Proposals (Regulation 18) was consulted on from 18 December 2023 to 19 February 2024. Local planning authorities have a statutory obligation to allow consultees a minimum of six weeks to respond as part of the plan-making process.
- 5.4 It is considered appropriate that Brentwood Borough Council express broad support for Thurrock Council's efforts to develop a local plan in accordance with national policy and guidance, and the commitment to continue collaboration through the duty to cooperate on strategic planning matters that affect South Essex. However, Brentwood has objected to the potential proposal for a large strategic development at West Horndon. At present not enough information is provided within the consultation document and the Council has made clear that any potential proposals that could jeopardise the Brentwood strategic allocation, Dunton Hills Garden Village, would not be supported.

## **6.0 FINANCIAL IMPLICATIONS**

**Name & Title: Tim Willis, Director – Resources & Section 151 Officer**  
**Tel & Email: 01277 312500 / tim.willis@brentwood.rochford.gov.uk**

6.1 There are no direct financial implications arising from this report.

## **7.0 LEGAL/GOVERNANCE IMPLICATIONS**

**Name & Title: Claire Mayhew, Acting Joint Director – People & Governance & Monitoring Officer**  
**Tel & Email 01277 312500 / Claire.mayhew@brentwood.rochford.gov.uk**

7.1 The Localism Act 2011 places a legal duty on local planning authorities and other defined local bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. It is currently 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.

## **8.0 ECONOMIC IMPLICATIONS**

**Name & Title: Laurie Edmonds, Corporate Manager – Economic Development Tel & Email 01277 312500 / laurie.edmonds@brentwood.rochford.gov.uk**

8.1 There are no direct economic implications, although the Thurrock Local Plan should be prepared in accordance with SEC joint working, helping to deliver economic growth across South Essex.

## **9.0 EQUALITY & HEALTH IMPLICATIONS**

**Name & Title: Kim Anderson, Corporate Manager - Communities, Leisure and Health**  
**Tel & Email 01277 312500 kim.anderson@brentwood.gov.uk**

9.1 The Public Sector Equality Duty applies to the Council when it makes decisions. The duty requires us to have regard to the need to:

- a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful;
- b) Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

- 9.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that ‘marriage and civil partnership’ is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 9.3 The proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.

## 10.0 ENVIRONMENTAL IMPACT

**Name & Title: Henry Muss, Sustainability & Climate Officer**  
**Tel & Email 01277 312500 henry.muss@brentwood.gov.uk**

- 10.1 There are no direct climate change implications arising from this report, although it is expected that as the Thurrock Local Plan develops it will include more details on how its strategy and policies meet the requirements of National Policy and Guidance on tackling climate change issues.

**REPORT AUTHOR:**

**Name: Andrea Pearson**

**Title: Senior Planning Policy Officer**

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## APPENDICES

- Appendix A: Brentwood Borough Council’s response to the Thurrock Local Plan, Initial Proposals (Regulation 18) consultation

## BACKGROUND PAPERS

- Thurrock Borough Council Local Plan, Initial Proposals Consultation: [Local Plan: Initial Proposals | Have my say | Thurrock Council](#)

## SUBJECT HISTORY (last 3 years)

Council Meeting	Date
None	