



Brentwood Borough Council response to the Thurrock Local Plan, Initial Proposals (Regulation 18) Consultation

1. Brentwood Borough Council (BBC) welcomes the opportunity to respond to Thurrock Council on the Local Plan, Initial Proposals consultation. BBC would like to thank Thurrock Council for agreeing to accept a response shortly after the consultation had officially closed to allow the response to be approved by members at the Planning Committee held on the 20 February 2024.
2. BBC supports Thurrock Council in their efforts to progress a new Local Plan. However, BBC are concerned that there was no prior engagement or updates provided on the progression of the Thurrock Local Plan. Both Brentwood and Thurrock are part of the South Essex Council (SEC). Officers meet on a regular basis which allows for local plan updates by all partners. It is, therefore, surprising that this platform was not utilised by Thurrock Council in advance of the Local Plan consultation commencing. Concerns are further escalated due to the level of potential development that could be allocated within the Thurrock Local Plan near to the Brentwood Borough boundary, in particular to the south of West Horndon. Therefore, moving forward Brentwood Borough Council would welcome regular updates and engagement through the duty to cooperate to ensure more positive and collaborative working can be achieved. BBC did contact Thurrock Council to arrange such a meeting following the commencement of the Thurrock Local Plan consultation and it has been agreed regular meetings will be scheduled to improve relationships between the two Councils'.
3. The Initial Proposals document does not include any draft policies or preferred site allocations. Rather, six growth options have been presented, resulting in potential growth ranging from 7,300 to 39,800 new homes. At present Thurrock Council have stated their housing needs are approximately 23,320, however this figure does not take into consideration the potential impacts of employment uplift. Furthermore, the consultation document states that the housing figure is calculated using the standard method which is the starting point. The recent National Planning Policy Framework updates from December 2023 makes clear that local planning authorities are expected to meet their full housing needs using the standard methodology. Exceptional circumstances would need to be appropriately evidenced and considered sound and justified to plan for a lower figure. Therefore, Brentwood would

encourage Thurrock to make every reasonable effort to meet their full housing needs.

4. It is also noted that the growth strategies identified within the consultation document, make clear that Thurrock is unable to meet their housing needs without the development of a large new settlement on land to the south of West Horndon, which adjoins the Brentwood Borough boundary. Brentwood Borough Council raises an objection to the potential growth in this location. This is based on the following factors:
 - There is a level of uncertainty around the full extent of the proposals that could come forward in this location;
 - There are still a number of key evidence documents to be advanced to a detailed stage which would provide a better understanding of the potential impacts of development in this location (e.g. Transport Assessment, Infrastructure Delivery Plan, Flood Risk Assessment etc);
 - Potential impacts on the delivery of Dunton Hills Garden Village (DHGV) which is allocated in the adopted Brentwood Local Plan and advancing through the planning application process. Priority is needed to be given to DHGV, including funding and infrastructure delivery to support this key allocation. Brentwood Borough Council would not be in support of any proposals that would jeopardise or have a negative impact on this development achieving its full potential.
5. Moving forwards, the Council would expect further ongoing positive collaborative working through regular meetings between the two Local Authorities. This should include wider partners such as Essex County Council, Basildon Council and other key Statutory Bodies. Brentwood Borough Council would also request Thurrock Council commit to undertaking active engagement with the local community at West Horndon, particularly the Parish Council who would be directly affected by these proposals.
6. Although no specific policies have been included within the initial proposals document, the consultation material makes clear that it is Thurrock Council's intention to include policies that require all new developments to achieve net energy, 35% affordable homes, and deliver 20% biodiversity net gains. BBC are in general support of these ambitions.
7. It is identified that Thurrock have a Gypsy and Traveller need for 75 new traveller pitches and 7 pitches for travelling show people. The consultation document is silent on the council's intentions of meeting these needs or identifying potential areas where these sites could be accommodated. Brentwood Borough Council would encourage Thurrock to meet these needs in full within the administrative boundary.

8. Brentwood Borough Council looks forward to ongoing engagement with Thurrock Council as the Local Plan progresses and through the work undertaken by South Essex Councils.

ENDS