

## Brentwood Borough Council Response to the Basildon Draft Local Plan Consultation (March 2016)

## Housing and Gypsy, Traveller and Showpeople Allocation

Thank you for inviting Brentwood Borough Council to provide comments as part of Basildon Borough Council's consultation on its draft Local Plan Consultation Document. Brentwood Borough Council is a neighbouring local planning authority (LPA) to Basildon 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 (PPG).

Brentwood Borough Council generally supports the draft plan and would like to take this opportunity to complement Basildon Borough Council on the hard work in evidence in their draft plan. 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 Strategic Objectives within the draft Local Plan and support the high aspiration of the Local Plan Vision.

Brentwood Borough Council note the identified need for 15,260 (14,582 plus 678 already delivered) homes to be delivered within the borough in order to meet the requirement of the NPPF in the period from 2014 to 2034 and that it is recognised by Basildon Borough Council that around 8,000 to 8,500 homes will need to be provided on sites on the of Basildon Borough Council main settlements, requiring the extent of the Green Belt to be amended.

Brentwood Borough Council would like to express their concern that Basildon Borough Council has not confirmed within Policy SD1, (page 24), that the borough is aiming to meet all identified development need within Basildon Borough. Further explanation and clarification of this will be required. Brentwood Borough Council is not able to meet development needs of any of the adjoining boroughs, as Brentwood Borough lies entirely within the Metropolitan Green Belt and will object to the Basildon Borough Council Local Plan on this basis if commitment to meet all identified development need is not made.

Brentwood Borough Council note the "pragmatic" proposal of an initial housing delivery target of 615 homes per annum to 2020, followed by a higher target of 822 homes per annum thereafter to 2034. However, Brentwood Borough Council wishes

to express their concern that this approach is one that 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 adjoining boroughs. Brentwood Borough Council is not able to meet development needs of any of the adjoining boroughs and will object to the Basildon Local Plan on this basis if commitment to meet all identified development need within Basildon Borough is not made.

Brentwood Borough Council notes that the Basildon Borough draft Local Plan does not attempt to meet their full Gypsy, Traveller and Showpeople need and that the proposal is to meet this through the Duty to Cooperate. Brentwood Borough Council wish to express their concern that Basildon Borough Council is failing to meet its identified need for the Gypsy, Traveller and Showpeople as required and that this is contrary to the NPPF and the Planning policy for traveller sites, DCLG August 2015. As Brentwood is a borough with over 89% of the Boroughs area designated as Green Belt, it is severely restricted in the suitable and available sites within the borough for new pitches or transit site provision and is therefore unable to meet the need of other boroughs.

Brentwood Borough Council wishes to support the proposals to regenerate Laindon Town Centre in terms of retail offer and improvement to the existing health facilities and that this process would be determined through a masterplan or development brief. Brentwood Borough Council would wish to be a consultee of the Retail and Commercial Leisure Strategy process with regard to the on-going need of the duty to cooperate on strategic matters as referred to in Paragraph 156 of the NPPF.

Brentwood support the statement that Basildon Borough Council will work closely with Highways England, Essex County Council and its neighbouring authorities to ensure that challenges arising from the Lower Thames Crossing to the local transport network are fully addressed. Brentwood Borough Council note the on-going work with Essex County Council, as the local Highways Authority, and SELEP regarding potential improvement along the A127 corridor.

## **Duty to Cooperate**

Brentwood Borough Council acknowledge that the dialogue between Basildon Borough Council and Brentwood Borough Council has been limited beyond the initial Memorandum of Understanding for Dunton Garden Suburb, this is clearly reflected in the Basildon proposal to meet some housing and Traveller need within Brentwood Borough without the sound procedural discussion that this requires. Brentwood Borough Council consider that the reinstatement of engagement with Basildon Borough Council is a priority in line with the required Duty to Cooperate, particularly on issues pertinent to proposed development of the Dunton area of the two boroughs.

Brentwood Borough Council welcomes the opportunity to continue to work with Basildon Borough Council in progressing the draft Local Plan and the supporting documents on an ongoing basis in line with the duty to cooperate.