

## Chelmsford City Council Response to Brentwood Local Plan (Regulation 19)

Chelmsford City Council (CCC) welcomes the opportunity to comment on the Brentwood Borough Council (BBC) Regulation 19 Pre-submission Local Plan prior to its submission to the Secretary of State for examination.

Officers at CCC have been working collaboratively with BBC through the Duty to Co-operate as outlined in paragraph 1.11 of the Pre-Submission document. CCC has responded to previous iterations of the Brentwood Local Plan including the Draft Local Plan in 2016 and Draft Local Plan Preferred Site Allocations in 2018.

CCC has the following comments on the consultation document:

### Duty to Co-operate

BBC and CCC have engaged on strategic cross boundary matters. A Protocol for dealing with unmet housing needs requests has also been agreed between Essex Local Planning Authorities through the Essex Planning Officers' Association which has resulted in an effective joint mechanism being put in place. Furthermore, both Councils have also been involved in a joint the Gypsy, Traveller & Traveller Showpeople Accommodation Assessment with relevant other Essex Local Planning Authorities. CCC consider that the Duty to Co-operate has been fulfilled and will continue to work collaboratively where appropriate with BBC through the Duty to Co-operate.

### Housing

It is noted that as a starting point the Local Plan sets out a housing requirement figure for Brentwood, as calculated using the standard method in the SHMA of 350dpa. CCC welcomes Brentwood Borough Council's commitment to significantly boost the supply of housing to meet the needs of the area and the decision to adopt a higher figure of 456dpa in anticipation of MHCLG intention to adjust the standardised methodology to safeguard against any potential uplift. When taking the supply buffer into account, the Local Plan provides for a total of 7,752 new homes over the plan period 2016-2033 setting a housing target of 456dpa. This is set out in Policy SP02: Managing Growth which sets the housing delivery targets of an annual average rate of 310 dwellings per year to 2022/23, followed by 584 dwellings per year from 2023/24-2033.

BBC proposes to meet its own housing need within its administrative boundaries and has not approached neighbouring authorities under the Duty to Co-operate to request other authorities help accommodate any unmet needs. This is supported by CCC.

It is noted that the Brentwood Gypsy and Traveller Accommodation Assessment (GTAA) identified that there is a requirement of 13 additional Gypsy and Traveller pitches to be developed by 2033. With no current need identified for accommodation for travelling showpeople, a criteria-based Policy HP11 Proposals For Gypsies, Travellers and Travelling Showpeople would deal with any need that arises over the life of the Plan on windfall sites. Overall, the need is being met with the authority's administrative area.

On transit sites, CCC acknowledges the GTAA's recommendations to engage, through the Duty to Cooperate, with other Essex authorities in the future to review the need for transit sites. Further work on this is also being undertaken by Essex County Council to consider the need for these sites across Essex as a whole.

Overall CCC is supportive of the approach to housing need in the BBC Local Plan and do not raise any objections under soundness or legal compliance.

### Employment

The Functional Economic Market Area (FEMA) for Brentwood is the same as the Housing Market Area. Policy PC02: Job Growth and Employment Land makes provision for 5,000 additional jobs to be provided in the borough over the plan period. CCC is supportive of BBC approach to meeting the forecasted employments needs through allocating 47.39ha employment land as set out in Policy PC03 Employment Land Allocations.

The Local Plan allocates additional strategic employment land at Brentwood Enterprise Park. In addition, further employment land is allocated and policies in the Local Plan seek to protect existing employment land providing a mix and range of employment sites.

Overall CCC is supportive of this approach and do not raise any objections under soundness or legal compliance.

### The Spatial Strategy and Relevant Site Allocations

The Spatial Strategy primarily focuses growth within two key growth areas (Central Brentwood Growth Corridor and South Brentwood Growth Corridor) together with more limited growth outside these growth areas in Village Service Centres and larger villages (including Ingatestone and Blackmore in proximity to Chelmsford City Council's administrative area).

The growth areas comprise:

Central Brentwood Growth Corridor - brownfield land in Brentwood and Shenfield together with wider urban extensions in places around the Brentwood Urban Area and opportunities to grow Ingatestone Village through urban extension to the south, providing new housing and supporting employment.

South Brentwood Growth Corridor - strategic allocation at Dunton Hills Garden Village, a strategic allocation at M25 junction 29 (Brentwood Enterprise Park) providing most of the new employment land needed, together with brownfield opportunities through the redevelopment of existing industrial land in West Horndon.

Section 9 of the Local Plan identifies the locations at which new development will be located. For Chelmsford, sites of local in proximity to the Chelmsford area are around 161 dwellings (R21) and around 57 dwellings (R22) to be provided on new Local Plan allocations in Ingatestone, together with around 40 dwellings (R25) and around 30 dwellings (R26) allocated on sites in Blackmore. CCC supports BBC's proposed approach to housing and employment allocations which are unlikely to have any obvious adverse cross-boundary impacts on Chelmsford.

However, it is crucial that the allocations are supported by the appropriate infrastructure, in particular highway and transportation schemes due to Brentwood's location on the A12/Greater Anglia road and rail corridor.

It is noted that the Infrastructure Delivery Plan is a 'live' document and would be reviewed and published annually.

To conclude, CCC is supportive of the Local Plan and does not raise any objections under soundness or legal compliance.