



planningpolicy@brentwood.gov.uk

Date: 13th September 2013

Dear Sir or Madam,

RE: Consultation Response in respect of Brentwood's Draft Local Plan

I am writing in respect of the Brentwood draft Local Plan published for consultation on the 24th July 2013. This letter sets out the response of Castle Point Borough Council to this consultation.

Castle Point Borough Council wishes to raise an objection to the proposals set out in Brentwood's draft Local Plan for the following reasons:

Insufficient evidence has been provided to demonstrate that it is not possible to meet the objectively assessed need for housing in Brentwood Borough's area.

The evidence of housing need for Brentwood is clear, with both the Greater Essex Demographic Forecasts Phase 3 SNPP 2010 Scenario and Brentwood's own work prepared by Peter Brett Associates both indicating a need for 360 homes per annum. The draft Local Plan however only makes provision for 233 homes per annum.

This lower level of provision appears to be justified on the basis of Green Belt designations which affect large swathes of Brentwood's land area. However, Brentwood Borough Council has not carried out a Green Belt Review to determine whether Green Belt boundaries could be revised to accommodate growth whilst maintaining the strategic purpose of the Green Belt. Green Belt is not a physical constraint but a policy designation that can be reviewed in accordance with paragraphs 83 to 85 of the NPPF in order to support the delivery of sustainable development. Therefore, it would appear that there is no evidence to justify the proposed under-provision of housing in Brentwood.

A failure to properly consider matters of Sustainability is also an issue affecting the robustness of the proposals set out in the Brentwood draft Local Plan.

Consultation on the Sustainability Appraisal Scoping Report only closed on the 5th July 2013. This was just five days before the Council made a decision on the draft Local Plan. This is insufficient time to take into account consultation responses on the Sustainability Appraisal Scoping Report, amend it accordingly, and then assess the proposed policies set out in the draft Local Plan.

Indeed, a Sustainability Appraisal of the draft Local Plan did not accompany the Committee Report on this matter, and has only recently been published with a publication date of August 2013. It was clearly not available, and did not form an integral part of the decision making process when the Council decided to support the draft Local Plan for consultation. This raises questions about the procedural soundness of the draft Local Plan, and potentially means that the draft Local Plan does not represent the most sustainable strategy for Brentwood.

Implications for the Thames Gateway South Essex Housing Market Area arise as a result of under-provision of housing in Brentwood. Failure to accommodate sufficient growth in Brentwood will force people to look for homes elsewhere in Essex with good connectivity to London. This will place increased pressure on the Thames Gateway South Essex housing market, which includes Castle Point, as well as Brentwood's neighbours Basildon and Thurrock.

The Thames Gateway South Essex housing market has its own constraints including viability issues, flood risk, nature conservation designations and the presents of hazardous installations and ports. These constraints are all evidenced through joint work across the sub-region, and also by the individual authorities.

These constraints make it a challenge to meet the housing needs of the constituent authorities of the Thames Gateway South Essex, let alone the needs of other housing market areas nearby, particularly when evidence has not been provided to robustly demonstrate that Brentwood cannot meet its housing need within its own boundaries, or that its draft Local Plan is the most sustainable strategy.

Potential impacts on European Sites have not been assessed. Whilst there may not be European Sites within Brentwood Borough's area itself, there are European sites around the Essex coast which development in Brentwood may impact on. Particular concerns in this regard are 'in-combination' with other Essex districts and relate to the approach to the management of water resources, and also to the impact population growth may have on recreational pressures within European sites. It is noted for example that the draft policy related to open space provision does not seek a specific level of provision, or seek to off-set impacts on areas of nature conservation importance.

I trust this response is of assistance to you, and highlights the importance of considering the wider implications of your plan. We would be pleased to engage with you further in order to ensure your final plan addresses the issues raised in this letter.

Yours sincerely,



Amanda Raffaelli
Senior Planning Policy Officer