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## **BRENTWOOD BOROUGH COUNCIL LOCAL PLAN –PREFERRED OPTIONS FOR CONSULTATION 2015-2030**

Thurrock Borough Council has considered the consultation on the Brentwood Council Preferred Options Local Plan and has the following representations to make:

### **1. SPATIAL STRATEGY (Policies S1, S2, S3, S4)**

The Brentwood Borough Local Plan Preferred Option Spatial Strategy Policy S1 seeks to protect the Green Belt and local character and focus new development between 2015-2030 on land accessible within existing settlements. Other than a strategic Green Belt development site identified at West Horndon there are no other significant Green Belt boundary changes.

Policy S2 of the Brentwood Preferred Options Document seeks to provide 3,500 dwellings for the period 2015-2030. However an alternative option to meet the objectively assessed need requirement of up to 5,600 is rejected. It is noted however that even the 5,600 dwellings proposed in the rejected scenario did not meet the level of dwellings that would be required to meet DCLG/ONS population and household projections for Brentwood as identified in the Roger Tyms & Partners 'Heart of Essex Growth' report and the EPOA population and demographic published scenarios.

The Brentwood draft local plan strategy is based on strong local support for protection of the Green Belt and technical evidence that suggests there are significant capacity constraints with higher levels of growth having significant impacts on Green Belt, landscape, settlement character and identity, together with congestion and infrastructure capacity issues.

Thurrock Council strongly objects to the Brentwood Borough Council Local Plan Preferred Spatial strategy option as set out in the draft plan policies S1 and in particular provision in Policy S2 to accommodate only some of the identified objectively assessed need for housing within Brentwood. Thurrock Council also objects to the Brentwood Local Plan looking to neighbouring authorities to accommodate the remainder of the need.

It is considered that Brentwood Council approach is flawed and the Council has not thoroughly tested all the available options to accommodate the housing requirement within Brentwood. The draft National Planning Policy Guidance and earlier advice from the Planning Advisory Service recommend that local authorities should be required to thoroughly test all reasonable options before requiring other authorities to accommodate some of their need.

The Government guidance places much emphasis on population and household projections forming the basis of objectively assessed need. Current advice and emerging draft national guidance also makes clear that authorities should consider accommodating the objectively assessed need within their areas first and then look to neighbouring authorities within its SHMA area. Brentwood Council does not demonstrate how it has considered accommodating the housing requirement within Brentwood or within the Strategic Housing Market Area as part of the Duty to Co-operate process. It is unclear how Brentwood anticipates dwellings provision being met for households identified by DCLG/ONS projections for Brentwood. It is unclear at this stage that the other mid-Essex authorities would accommodate such housing requirement.

Thurrock Council whilst an adjoining authority is not within the Brentwood SHMA area and at this stage does not consider that other options to accommodate Brentwood's dwelling requirement within Brentwood have been fully examined and tested in accordance with government policy and guidance. Therefore the approach to preparation of the local plan is unsound.

It is considered that Brentwood Council should undertake a formal Green Belt review (see further comments below) as part of the spatial options testing which is subject to further public consultation before the Council progresses the local plan to submission stage.

Furthermore considerable elements of the evidence base including the character assessment, infrastructure and transport studies have not been made available during the consultation process and have therefore not been able to be included in any comments at this stage. It is considered this is a major error in the consultation and Duty to cooperate process and that the plan and evidence when available should be subject to further consultation.

## 2. Green Belt Issues (Policies S1, S2 and CP10)

Although Thurrock Council strongly supports the purpose and function of the Green Belt there is a strong objection to the Brentwood Preferred Option Local Plan for the failure up to this stage to include a formal Green Belt review as part of the local plan process.

Within the Preferred Option Brentwood Council Local Plan there is a proposed strategic release at West Horndon of up to 1500 dwellings. However the Brentwood Preferred Option Local plan only accommodates some of the objectively assessed housing requirement and it is considered this represents

the exceptional circumstance appropriate for Brentwood to undertake a Green Belt review.

The National Planning Policy Framework makes provision for the review of Green Belt boundaries in order to meet other objectives of the framework and it is considered Brentwood should undertake such a review to accommodate its housing need. No compelling evidence has been presented at this stage as to why the Council should not undertake such a Green Belt review. Strong support for the Green Belt by the community in itself is not a strong enough argument for not undertaking a Green Belt review.

A number of the adjoining authorities also have Green Belt designations. In the case of Thurrock the Green Belt extends across the entire Borough outside of the urban areas. Thurrock could not accommodate the unmet Brentwood housing need without undertaking a review of its own Green Belt. Thurrock Council strongly objects to Brentwood Council policy approach as unreasonable in seeking to meet its housing need in adjoining authorities with extensive Green Belt coverage when it has itself not undertaken a Green Belt review.

In addition in Thurrock the Green Belt serves a major strategic regeneration function by focusing development within the urban areas. The same function does not appear to be a key role of the Brentwood spatial strategy.

#### West Horndon - Strategic Housing Location (Policies S1, S2, CP3 and CP4)

It is noted that Brentwood Council have identified Green Belt release at West Horndon for up to 1000 dwellings (and 500 on PDL land in industrial estates). Thurrock Council remains concerned about the lack of detail on location, delivery and phasing of such a development. It is considered that if these issues are not properly addressed then the development may not be delivered and exacerbate the lack of housing provision within the Brentwood Local Plan. This would put further pressure on adjoining Council to potentially accommodate such a requirement. Thurrock Council requests that more detail is provided as to how such a release is to be achieved and incorporated into a more formal Green Belt review process and Local Plan consultation.

Thurrock Council is at a very early stage of the review process of its adopted Core Strategy. However during the previous Core Strategy draft stages and preparation of the evidence base including infrastructure and SA/SEA assessments, the Council did not support an expanded settlement at West Horndon based on development south of the railway line in Thurrock. It is unlikely that land south of West Horndon in Thurrock would be supported as a preferable location to accommodate future development in the review of the Core Strategy.

#### Role of Shenfield and Crossrail (Policies S1, CP11)

It is recognised that Brentwood Council have considered alternative options as part of the Local Plan process including the rejection of a transport led

growth option. However Thurrock Council considers the role and potential economic benefits of Crossrail in particular with regard to development at Shenfield has not been fully assessed and incorporated as part of the Brentwood Preferred options Local Plan and in particular the preferred spatial strategy option and associated policies.

The NPPF states that in preparing their plans local authorities should support opportunities for growth. The economic impact of Crossrail within Brentwood needs to be considered and assessed in detail. The improvements to the existing rail lines and increased frequency of services are likely to make Brentwood and Shenfield in particular a favourable location to live and work and stimulate economic growth.

The preferred options plan makes reference to a “Park and walk” scheme but contains no specifics strategy or policies to direct and support growth at Shenfield.

It is considered the role and development of Brentwood and in particular Shenfield as a terminus of Crossrail should be thoroughly investigated and its potential role to accommodate further growth over the period of the local plan and beyond. The implications of the potential to accommodate more growth and associated infrastructure requirements need to be considered with some weight as a way of meeting the undersupply of housing requirement currently identified in the Brentwood Local Plan options and supporting evidence

There is also an objection to the lack of a published detailed evidence base assessing the transport impacts of the various spatial strategy options and a detailed economic and transport assessment of the impacts of Crossrail and with particular reference to Shenfield.

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