



F5K Council's response to Q88-91 general matters - August 2020

INSPECTORS' QUESTION 88

Paragraph 22 of the Framework states that strategic policies should look ahead for a minimum 15 year period from adoption. The strategic policies in the Plan look ahead to 2033, so if the Plan was adopted in 2021, it would not provide for a 15 year period. How does the Council propose to address this matter so that the Plan would be consistent with the Framework? What would be the implications for the evidence base supporting the Plan and for the policies if the plan period were to be extended?

15 year plan period

1. It is recognised that Paragraph 22 of the Framework sets out that strategic policies should look ahead over a minimum 15 year period from adoption which would mean the Local Plan would have needed to be adopted in 2018 for this to be fully compliant with this part of the Framework.
2. However, following the publication of the Housing White Paper in February 2017 Brentwood Borough Council were subsequently written to by the Secretary of State for Communities and Local Government expressing concerns that the Council had persistently failed to get a Local Plan in place in November 2017 outlining that Local Plan Intervention could be considered if action was not taken to address this.
3. During this time the Council was finalising the Draft Local Plan Preferred Site Allocations document and advancing this through a number of Ordinary and Extraordinary Council meetings with approval to consult being given in January 2018. An updated Local Development Scheme was also approved outlining an accelerated timetable with submission to take place towards the end of 2018.
4. A further letter from Secretary of State for Communities and Local Government was received in March 2018 which welcomed the progress the Council was making but noted that the Council remained without and up to date Local Plan. It set out that progress on the Plan would continue to be monitored and any further significant delays in meeting the timetable would cause considerable doubt as to whether the Council was doing everything that is necessary in connection with the preparation of the Local Plan and could lead to intervention.

5. Following this the Council reviewed the representations received in response to the recently completed Preferred Site Allocations consultation. Work also commenced on the preparation of the Regulation 19 Pre-Submission Local Plan. This work was completed and taken to Extraordinary Council for approval on 8 November 2018 subject to a number of amendments. As a result of the amendments it was necessary to review and update the Sustainability Appraisal and other evidence documents such as the Infrastructure Delivery Plan. This resulted in the Regulation 19 Pre-Submission Local Plan being published in February 2019.
6. As a result of the number of representations received in response to the Pre-Submission Local Plan consultation, many of which were hard copy and handwritten, this added significantly to the processing time. Following analysis of the representations received the Council decided to suggest amendments to the Pre-Submission Local Plan in relation to the quantum of development in certain locations. The consultation on the suggested amendments was agreed at a Policy, Resources and Economic Development Committee in September 2019. Consultation commenced in October 2019 and closed at the end of November 2019. The intention was for the Pre-Submission Local Plan along with the Addendum of Focussed Changes to be submitted to the Secretary of State soon after this. However, this was delayed due to General Election which was held in December which resulted in planned Council meetings being postponed until January. The decision to submit the Plan along with Addendum of Focussed Changes was made at the end of January 2020 with submission formally taking place February.
7. While it is regrettable that the result of delays in preparation of the Local Plan results in a Plan which only runs to 2033 it is considered that in light of the above having a Plan in place would significantly outweigh further delays to get the Plan up to the required 15 year period upon adoption.
8. The evidence base which underpins the Local Plan runs to 2033 so to extend the Plan period would require all relevant evidence base to be reviewed and updated. Assuming an adoption date in 2021 the plan period would need to extend by 3 years up to 2036. The impact would result in needing to identify additional housing supply of at least 1,368 dwellings, assuming a requirement of 456dpa. In addition, further employment land and Gypsy and Traveller provision are likely to need to be identified. All evidence would need to be reviewed and additional need being subject to further testing against spatial alternatives and green belt considerations but evidence relating to the following are most likely to require updating:
 - Strategic Housing Market Assessment (SHMA) parts 1 and 2
 - Economic needs assessment
 - Gypsy and Traveller Accommodation Assessment (GTAA)
 - Housing and Economic Land Availability Assessment (HELAA)
 - Infrastructure Delivery Plan
 - Transport Assessment
 - Local Plan Viability Assessment
 - Green Belt review

- Sustainability Appraisal
9. To review and update the evidence base would have and would result in significant delays to getting a Plan in place, which would be contrary to the direction received by the Secretary of State in the letters outlined above.
 10. Recognising that the Council has encountered difficulties in getting to this stage of the Plan making process, the Council is being pragmatic in its approach and is committed to an early review of the Plan. Proceeding on the current basis is important in order to provide strong policies to support growth and meet, amongst other things, imperative housing and employment needs in the plan period to 2033, but particularly in the short and medium term.

INSPECTORS' QUESTION 89

Paragraph 16 includes requirements that plans should 'serve a clear purpose' and 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. In this regard we note that a number of the policies in the Plan appear mainly or partly to set out general Council aspirations or objectives rather than to provide a clear indication of how a decision maker should react to a development proposal. Can the Council comment on this approach?

INSPECTORS' QUESTION 90

The site allocation policies state that 'Development proposals should consider the following:...' and then provide criteria on the amount and type of development and the development principles for each site. Can the Council clarify whether these are policy requirements rather than just considerations and if not, explain how a decision maker would apply such policies to development proposals?

11. With regards to questions 89 and 90 it is noted that the wording of some policies could be made more effective in being clear about what is expected of developers in any particular case and to avoid repetition of requirements. The Council is in the process of reviewing these policies and is proposing to prepare a schedule of suggested modifications. The overall substance of the policies will not change.

INSPECTORS' QUESTION 91

Are there any neighbourhood plans in preparation within the Borough and if so what stage have they reached?

12. There are three designated Neighbourhood Plan Areas within the Borough. Details of current progress is set out below:

- **Doddinghurst Neighbourhood Plan** - Brentwood Borough Council approved the designation of Doddinghurst Parish as a Neighbourhood Plan Area at Policy & Resources Board on 13 December 2012. No comments were received in response to a six week consultation from 7 September to 19 October 2012. Whilst work was commenced at these early stages no further work has been forthcoming since.
- **West Horndon Neighbourhood Plan** - Brentwood Borough Council approved the designation of the West Horndon Parish as a Neighbourhood Plan Area at Planning & Development Committee on 19 November 2014. Consultation on the proposed area took place for six weeks between 29 May and 10 July 2014. A total of 23 responses were received showing broad support for the entire parish to be designated. West Horndon Parish Council has started developing a Neighbourhood Plan after the consultation on the Brentwood Local Plan Pre-Submission in February 2019, at this stage no draft documentation has been shared with the Council.
- **Ingatestone & Fryerning Neighbourhood Plan** Brentwood Borough Council approved the designation of the Ingatestone and Fryerning Parish as a Neighbourhood Plan Area at Planning & Licensing Committee on 11 October 2017. In the case of this application, the legislation requires that the Council designate the area specified in the application, which covers the whole of the parish. The draft neighbourhood plan has been prepared and was intended to be published for consultation in spring 2020 but this was postponed due to the effects of Covid-19. Currently this is still pending with no confirmed date.