

Consultation Response

**Brentwood Borough Council
Draft Local Plan**

**On behalf of Elizabeth Finn Care
trading as Turn2Us**

March 2016



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1 INTRODUCTION

- 1.1 This representation on the Brentwood Draft Local Plan (DLP) 2016 is submitted by Strutt & Parker LLP on behalf of Elizabeth Finn Care trading as Turn2Us, a charity fighting UK poverty.
- 1.2 As the Council will be aware from our previous submissions in February 2015 (in respect of the Strategic Growth Local Plan Consultation) Elizabeth Finn Care is the owner of land adjacent to Rayleigh Road, Hutton. An area of land that, again as per previous submissions, Elizabeth Finn Care are actively promoting for residential development.
- 1.3 A larger parcel of land in which this site sits was assessed by the Council as part of the Brentwood Borough Council Strategic Housing Land Availability Assessment (SHLAA) (2011), under site reference GO92.
- 1.4 For completeness a map showing the submitted site is provided as **Appendix 1** to this submission.
- 1.5 The site is on land currently allocated as Green Belt in the Brentwood Replacement Local Plan (2005), but is situated immediately adjacent to the settlement boundary and within Hutton Village Conservation Area. It should be recognised that the settlement boundaries contained within the Brentwood Replacement Local Plan were predicated on the need to accommodate significantly less development than currently required, and this site is located in a sustainable position on the eastern edge of Hutton directly to the west of Rayleigh Road, in an area of residential character.
- 1.6 The specifics of the site – and its sustainability for allocation for residential development – is addressed within Section 4 of this submission.
- 1.7 We have a number of concerns in respect of the proposed approach as set out in the DLP, and fear that if the Council are to proceed in the current direction it will result in a plan that is unsound. Our concerns are detailed within this submission.

2 DUTY TO COOPERATE

- 2.1 We note the Council recognises the requirement to cooperate with other authorities under the Duty to Cooperate in the preparation of its Local Plan (paragraph 2.22 of the DMP).
- 2.2 We further note that the proposed strategy for delivering housing is heavily reliant on the development of Dunton Hill Garden Village. The suitability, sustainability and deliverability of such an approach is discussed further within Section 4 of this representation.
- 2.3 However, in relation to the Duty to Cooperate, we note that Dunton Hill Garden Village is a cross-boundary proposal, that straddles the boundary between Brentwood and Basildon Boroughs. As such, it will require the support of both Brentwood Borough Council and Basildon Borough Council working together as the relevant Local Planning Authorities in order to be delivered.
- 2.4 To date, information published in respect of the Duty to Cooperate and how Brentwood Borough Council and Basildon Borough Council are working together on Dunton Hill Garden Village is limited. A Memorandum of Understanding was prepared between the authorities, committing to the preparation of a consultation document relating to the Dunton Hill Garden Village in November 2014. A Consultation Document – ‘Dunton Garden Suburb Consultation: Exploring the potential opportunities for cross boundary development’ – was subsequently published by both authorities, followed by a report into the consultation.
- 2.5 However, other than this exploratory consultation document, we are unable to find any published information that suggests the authorities have progressed plans and firmed up proposals. Given the significant extent of the reliance on the Dunton Garden Village by the DLP to delivery what the Council considers to be the Borough’s housing need, we would have expected details setting out a firm commitment by both authorities to the delivery of the project to be published alongside the DLP.
- 2.6 On the contrary, we note the following statement that was published by Basildon Borough Council in January 2016 alongside consultation on the Basildon Draft Local Plan consultation:

“In the period from January to March 2015, the Council and Brentwood Borough Council jointly consulted on a proposal known as Dunton Garden Suburb. This was a proposal for a community comprising 4,000 to 6,000 new homes and

associated employment provision and community facilities, straddling the boundary between the two boroughs.

“Having considered the outcomes of this consultation, the Basildon Draft Local Plan does not include proposals for Dunton Garden Suburb, as Brentwood Borough Council has not provided sufficient information, at this time, to show it is the best location for new housing provision in the Brentwood borough.”

- 2.7 Given this stance by Basildon Borough Council, we question how effectively the Duty to Cooperate has been met in respect of the DLP and Dunton Hills Garden Village in particular.
- 2.8 Cross-boundary issues relevant to Local Plan are not limited to proposals in respect of Dunton Hills Garden Village. Brentwood is not an island and the DLP acknowledges the multitude of relationships between the Borough and surrounding areas.
- 2.9 This includes the strong relationship with London: the presence of the Brentwood within the London Arc, the connectivity between London and Brentwood, and the reliance of Brentwood’s population on London for employment (Figure 2.3, paragraphs 2.23, 2.34, 2.51, 5.64, 8.7, 8.22, 9.31 of the DLP).
- 2.10 The arrival of Crossrail is identified as one of the Borough’s key characteristics (Figure 2.4 of the DLP):

“The arrival of Crossrail at Brentwood and Shenfield will improve the existing metro service and provide new direct links through Central London. This could provide opportunities for development and investment, but also challenges for existing infrastructure capacity”.

It is clear that crossrail is anticipated to further strengthen the relationship between London and Brentwood. For example, the DLP states at paragraph 2.51:

“Crossrail will provide the Borough with an improved train service, increased capacity, station improvements and new direct links to Central London, Heathrow Airport and the West.”

- 2.11 Notwithstanding the above it is not clear to how Brentwood Borough Council have engaged with London Boroughs or the Mayor of London in the preparation of the DLP.

- 2.12 In addition the Borough has a strong connectivity and relationships with neighbouring Essex authorities. Figure 8.1, for example, depicts how well Brentwood is placed in terms of transport links to surrounding centres in Essex, (as well as London and Kent) and airports at Stansted and Southend.
- 2.13 Notwithstanding the above, and disconcertingly, there is reference within the DLP to Brentwood Borough being considered to constitute a self-contained housing market area (paragraph 5.36) – a stance that is contradicted by numerous references within the DLP to the strong relationships between Brentwood and surrounding areas. Further the plan appears to seek to solely meet the objectively assessed needs of Brentwood Borough, without consideration of any unmet needs of neighbouring authorities. It is not clear to what extent authorities with whom Brentwood Borough has a connection have been engaged and are agreeable to such an approach. This issue is particularly pertinent given the strong relationship between Brentwood and London, and the latter’s acute housing need. We question whether the approach currently being taken in the preparation of the Local Plan meets the Duty to Cooperate.

3 OBJECTIVELY ASSESSED HOUSING NEED

- 3.1 We note that the Council has determined the objectively assessed housing need for the Borough to be 362 dwellings per annum, informed by the Strategic Housing Market Assessment (2013) (SHMA) and Objectively Assessed Housing Needs for Brentwood (2014)
- 3.2 The figure of 362 dwellings per annum appears to have been informed by population projection analysis carried out by Edge Analytics for Brentwood, and cited in the SHMA.
- 3.3 The Objectively Assessed Housing Needs for Brentwood, however, also considers the delivery of 411 dwellings per annum as a feasible housing target for the Borough. It is not clear on what basis this level of growth has subsequently been rejected by the DLP.
- 3.4 In determining objectively assessed need the National Planning Practice Guidance (NPPG) (Paragraph: 019 Reference ID: 2a-019-20140306) is clear that market signals should be considered and the housing need number suggested by the household projections adjusted to reflect these. Further, the NPPF is clear that Local Plans

should have regard to market signals. In the case of Brentwood Borough, and as acknowledged within the DLP itself, the Borough has among the most expensive housing in Essex, comparable to London house prices. This suggests the housing figure should be revised upwards from that suggested by household projections.

- 3.5 The NPPF (paragraph 47) is clear that Local Planning Authorities should seek to significantly boost the supply of housing.
- 3.6 In addition, the NPPF requires Local Plans to be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. It is not clear from the DLP how unmet needs in neighbouring areas have been considered. On the contrary, the DLP indicates at paragraph 5.36 that only housing needs within the Brentwood Borough boundary have been addressed. As noted earlier within this submission, the DLP recognises how well connected the Borough is with neighbouring areas and London. It follows that the Borough may be suitably placed to accommodate some of the unmet needs of such areas, and this should be explored through the Local Plan process if it is to avoid being unsound.
- 3.7 It is noted that strategic objectives of the DLP include to maintain high and stable levels of economic growth; and economic development is one of the overarching priorities set out in the Corporate Plan 'Vision for Brentwood' 2016-19. It should be recognised that housing development has intrinsic economic benefits. This includes employment relating directly to the construction of the development, and jobs relating to the supply chain. Housing development also engenders local economic benefits relating to additional local expenditure. It is important that the economic growth aspirations of the Local Plan and the housing growth policy support, rather than contradict, one another.
- 3.8 There are clearly factors that suggest the Brentwood Local Plan should seek to deliver a greater number of homes than proposed in the DLP. At the very least the provision of a greater number of dwellings is a reasonable option that should be explored.

4 HOUSING GROWTH STRATEGY

- 4.1 For the reasons set out within Section 3 of this representation, it is considered that the Brentwood Local Plan should seek to deliver a greater number of new homes than the DLP proposes. However, we would question the deliverability of even the

reduced quantum based on the strategy currently proposed by the DLP. Of particular concern is the reliance placed on Dunton Hills Garden Village and on windfall to help meet housing needs.

Reliance on Dunton Hills Garden Village

- 4.2 Dunton Hills Garden Village is relied upon to deliver 2,500 of Brentwood Borough's proposed housing target of 7,240 net additional dwellings between 2013 and 2033. This equates to over a third of the District's housing target. The District's strategy hinges on the deliverability of Dunton Hills Garden Village and as such there should be considerable certainty that it will come forward. However, the opposite is the case.
- 4.3 As noted within Section 2, the delivery of Dunton Hills Garden Village requires the support of Basildon Borough Council, yet they have recently published information to suggest their Local Plan will not support such a development.
- 4.4 Given the scale of Dunton Hills Garden Village, deliverability would likely be challenging even if there was support from all relevant Local Planning Authorities. The delivery of a development of the scale of Dunton Hills Garden Village would require collaborative working between a multitude of authorities, service / infrastructure providers, landowners and developers.
- 4.5 In addition to deliverability, the suitability and sustainability of Dunton Hills Garden Village is questionable. We note that the Dunton Garden Suburb Consultation documentation included a new train station between the existing stations of West Horndon and Laindon to serve the new development. The Dunton Garden Suburb Consultation Sustainability Appraisal makes references to the train station mitigating some of the potential negative impacts of Dunton Garden Suburb proposals. In terms of seeking to demonstrate the sustainability of Dunton Hills Garden Village, the provision of a train station is clearly a critical element. However the proposed new station is not included in the Network Rail Anglia Route Study Draft for Consultation (November 2014), which sets out the strategic vision for the future of the Anglia route network over the next 30 years. A new station would impact on service headways and so may reduce line capacity. An assessment would need to be undertaken on the impact of an extra stop close to two existing stations on journey times and Essex Thameside line capacity, and would be subject to agreement from both National Rail and the rail operator c2c.

4.6 In addition, the Dunton Garden Suburb consultation documents are largely silent on the access strategy and potential mitigation measures necessary to accommodate development traffic on the existing local and strategic highway network.

Reliance on windfall

4.7 In addition to placing a significant reliance upon Dunton Hills Garden Village to meet housing targets, the DLP strategy relies on windfall to deliver 928 dwellings – 12% of the proposed total.

4.8 Despite the DLP's a relatively high degree of reliance on this potential source of housing development, the DLP states at paragraph 5.44 that the Council is keen not to be reliant on windfall.

4.9 It is stated at paragraph 5.43 that windfall will continue to contribute towards housing supply over the next 15 years. By definition, there is considerable uncertainty as to how much of a contribution windfall will be able to make towards delivery housing. It is far from clear that it will be able to make the level of contribution which the DLP assumes.

4.10 Having regard to the above, in the interests of ensuring greater certainty in respect of meeting housing targets, and mindful of the Government's requirement as per paragraph 47 of the NPPF for Local Planning Authorities to seek to significantly boost housing supply, windfall should be discounted from the housing trajectory within the Local Plan, or at the very least significantly reduced such that it is not relied upon in order to meet housing need.

4.11 One of the tests of soundness for the Local Plan, as per the NPPF, will be whether it is effective – whether the plan is deliverable over its period and is based on effective joint working on cross-boundary strategic priorities. If the Local Plan were to continue to place reliance on development of Dunton Hills Garden Village and windfall to meet development needs it would fail to be meet this test of soundness.

4.12 Figure 5.10 of the DLP shows that the current housing delivery rate is well below that required to meet what the Council consider to be the Borough's need. Furthermore, it is projected to remain below this level in the short-term. There is clearly a current, urgent housing need in the Borough. The DLP should not seek to rely on large strategic sites to deliver housing, as these cannot meet housing need in the short-term and enable the Borough to retain a five-year housing land supply, as required by the NPPF (paragraph 47). To ensure the plan is capable of addressing the current

urgent housing need and ensuring a five-year housing land supply a range of sites should be identified, including smaller sites that are deliverable in the short-term.

Site selection and Land adjacent Rayleigh Road, Hutton

- 4.13 We note that the Draft Local Plan sets out a proposed hierarchy of place to inform the spatial distribution of growth. This includes four different settlement categories, with Settlement Category 1: Main Town comprising the Brentwood Brentwood Urban Area, made up of the local centres of Brentwood, Shenfield, Hutton, Warley, Brook Street, and Pilgrims Hatch. The Draft Local Plan notes that Settlement Category 1: Main Town is well served by public transport, with rail stations at Brentwood and Shenfield, and provides a range of shopping, employment areas, secondary schools, health and leisure facilities in close proximity to residential areas. The inclusion of Hutton within Settlement Category 1 suggests it is an appropriate and sustainable location to direct a proportion of growth towards. However, it is unclear how the settlement hierarchy has informed the selection of sites for development within the DLP.
- 4.14 We note that sites have been selected based on a “sequential approach to sustainable land use” (paragraph 7.29 of the DLP). This appears to result in any site within an existing settlement boundary being automatically considered more sustainable than brownfield sites in the Green Belt, which in turn are considered inherently more sustainable than any greenfield site in the Green Belt. We question the soundness of such a simplistic approach to the consideration of sustainability, and whether this approach will result in the most sustainable strategy when considered against the reasonable alternatives. Furthermore, it is unclear whether a Green Belt review has been undertaken prior to this filtering process to determine whether all land currently allocated as such meets the purposes of including land in the Green Belt, as set out in the NPPF.
- 4.15 Five greenfield Green Belt site are proposed for allocation for housing development in the DLP. The justification for the identification of the five greenfield Green Belt sites is unclear, as is the justification for the rejection of land adjacent to Rayleigh Road, Hutton.
- 4.16 There is reference at paragraph 7.28 of the DLP to the 2010 Strategic Housing Land Availability Assessment (SHLAA) being the starting point for considering sites as part of the plan making process. The most recent SHLAA is the 2011 iteration, and as such is somewhat dated. Furthermore, whilst a larger parcel of land in which our client’s site sits was assessed by the Council as part of the Brentwood Borough 2011 SHLAA as site reference GO92, it is unclear how the site as submitted in response to

consultation on the Strategic Growth Local Plan in February 2015 has been assessed or considered.

- 4.17 In terms of site reference GO92 and its assessment in the SHLAA 2011, the SHLAA 2011 found the site GO92 to be available and achievable, but stated that it was not suitable. The justification for this set out within the SHLAA was as follows:

“The site lies within the Hutton Village conservation area and development on this scale would have an unacceptable impact on the character of the conservation area. Development would also have a detrimental impact on the visual and landscape quality of the area.”

- 4.18 The above concerns have been addressed through subsequent submissions to the Council, as discussed later within this representation.
- 4.19 The site that is the subject of these submission (shown as **Appendix 1**) measures 2.4 ha in area. It is low quality grazing land which does not make a positive contribution to the character or appearance of the Conservation Area, and is of low landscape value. It is used as paddocks and, as such, principally comprises open pastoral grassland.
- 4.20 The site is on land currently allocated as Green Belt in the Brentwood Replacement Local Plan (2005), but is situated immediately adjacent to the settlement boundary of Hutton.
- 4.21 Hutton is situated in Essex, approximately 30 kilometres from Central London, 12 kilometres from Chelmsford in a position well related to regional and national infrastructure. Hutton lies in close proximity to Brentwood and Shenfield on the A12 corridor.
- 4.22 Hutton has strong service and education provision. The settlement benefits from excellent access to Shenfield High Street on the Hutton Road which adjoins Rayleigh Road and runs centrally through the settlement on an east-west axis. The High Street provides for a variety of services, shops and businesses.
- 4.23 In addition to an active and accessible service centre, Hutton Business Park is situated approximately 1 kilometre north of the land adjacent to Rayleigh Road and provides opportunities for local employment. In terms of education, Hutton supports strong state and public school provision including three primary schools, a secondary school and a public school which meet the educational requirements of the area.

- 4.24 As such, Hutton is well placed to accommodate a proportion of Brentwood Borough's housing needs, as recognised through the DLP where it identifies Hutton as forming part of the Settlement Category 1.
- 4.25 Despite Hutton's position within the settlement hierarchy, the DLP does not appear to provide a cogent strategy for directing growth to this settlement.
- 4.26 Subsequent to the publication of the SHLAA we made submissions in relation to a smaller area of land that forms part of site GO92 in response to the Council's consultation on Strategic Growth Options and Dunton Garden Suburb Local Plan Consultation in February 2015. This submission was accompanied by extensive supporting technical work, comprising:
- Site Opportunities and Constraints plan prepared by Go Planning Ltd.
 - Site Master planning prepared by Go Planning Ltd.
 - Site Context Sheets 1 & 2
 - Site Landscape Assessment prepared by Lockhart Garratt
 - Tree Constraints and Opportunities Report prepared by Lockhart Garratt
 - Ecological Constraints and Opportunities Report prepared by Lockhart Garratt
 - Access Appraisal prepared by Journey Transport Planning
- 4.27 The representations submitted also addressed concerns raised by the SHLAA in respect of the larger area of land in which the site sits. In respect of the sites location within the Hutton Village Conservation Area, at detailed design stage the development proposal would be prepared sensitively having regard to the setting of the site. Rather than seeing the Conservation Area characteristics as a constraint to development, it is considered to be an opportunity, particularly given the fact the existing site does not currently make a positive contribution to the character or appearance of the Conservation Area. The proposed development will seek to reflect and integrate key features of the Conservation Area into the design and layout. The strong architectural character of the area presents an opportunity to provide a high-quality design-led development that will make a positive contribution to the character and appearance of the Conservation Area. Further, development of the site would provide opportunity to provide an area of public open space within the site. This would not only further enhance the appearance of the area, but would also provide accessible public open space for the local community.

- 4.28 In terms of landscape and visual impact our submissions in respect of the site of land adjacent to Rayleigh Road, Hutton, included a site masterplan, informed and supported by studies, including a landscape assessment.
- 4.29 It should be emphasised that the material previously submitted also set out that the site can be developed without compromising the wider objectives of the openness of the Green Belt.
- 4.30 The NPPF states that the purposes of including land in the Green Belt are as follows:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.31 The site is immediately adjacent to the existing settlement boundary (to the west). To the north and east, it is contained by Rayleigh Road. A copse of trees abounds the southern boundary of the site and naturally shields the site to views from the south. As such, a revised Green Belt boundary that places the site within the settlement boundary would result in the creation of a robust, defensible Green Belt boundary.
- 4.32 Development of the site would not result in the unrestricted sprawl of large built-up areas or the merging of neighbouring towns, result in encroachment into open countryside, or undermine the setting and special character of Hutton. Given the extent of housing need in the Borough, the site's allocation for development would not discourage urban regeneration – the Council has already confirmed that the Borough's housing target cannot be met through development within existing urban areas alone. As such, allocation of the site for housing would not undermine the purposes of including land in the Green Belt.
- 4.33 Our previous submissions have also set out the sustainability of land adjacent to Rayleigh Road, Hutton for residential development. There are three dimensions to sustainable development: economic; social and environmental. A summary of the site's impact in relation to each of these facets is set out below.
- 4.34 In terms of economic impact, there is an inherent link between providing homes and the creation of jobs. Benefits of the site's development include additional local expenditure in and around Hutton from the additional residents. The intention for

the land adjacent to Rayleigh Road, Hutton is to provide homes for people working in and around the Hutton area, assisting in local economic development.

- 4.35 The body of environmental consultancy work including detailed landscape appraisal, arboricultural investigations, ecological surveying and site master planning previously submitted to the Council have confirmed that the site can be brought forward for development without undue harm to the environment. Development of the site will reduced pressure to accommodate development on potentially more environmentally sensitive sites.
- 4.36 In respect of social impacts, the land adjacent to Rayleigh Road is very well connected to local service provision with the majority of Hutton and Shenfield's services within a 2km radius of the site. In addition, the site benefits from excellent public transport links. The provision of homes to meet housing needs will have very significant social sustainability benefits.
- 4.37 In summary, the site – as set out in previous representations – is sustainable and deliverable. Furthermore, it would not undermine the purposes of including land in the Green Belt, and its allocation for development would result in the creation of a new robust, defensible Green Belt boundary for this location. As such it is a suitable site capable of helping to meet housing need in the short-term. It is not clear from the DLP or its supporting documentation how information submitted to the Council since the publication of the SHLAA has been considered, and why land adjacent to Rayleigh Road, Hutton has not been identified for development in the DLP.

5 SUSTAINABILITY APPRAISAL

- 5.1 The Sustainability Appraisal (SA) plays an important role in the plan-making process. It should be used to identify and consider all reasonable alternatives at an early stage in the plan making process, and should inform the local planning authority in choosing its preferred approach.
- 5.2 It is imperative that the SA considers all reasonable alternatives. We would draw the Council's attention to judgments in respect of *Heard v Broadland District Council*, *South Norfolk District Council*, *Norwich City Council* [2012] and *Save Historic Newmarket Ltd v. Forest Heath District Council* [2011]. The judgments in these cases confirm *inter alia* the need for the public to be presented with an accurate picture of the reasonable alternatives at an early stage; for these alternatives to be subject to appraisal; and for reasons for their rejection / selection to be explained within the Environmental Report.

- 5.3 We have concerns with the current approach to SA in respect of both how the proposed total housing figure has been considered; and specific individual sites have been assessed.
- 5.4 In respect of the total housing target for inclusion in the Local Plan, we note the Interim SA published alongside the DLP assumes the Local Plan will plan for the delivery of 7,240 new homes over the plan period (2013 - 2033). As set out within this representation, the provision of a greater number of new homes is clearly a reasonable alternative that merits consideration. However, there appears to be no assessment of the sustainability of a higher level of growth.
- 5.5 In terms of our client's land at Rayleigh Road, Hutton the site appears to have been appraised as Site ID 219 within Table C of the SA, though this may in fact relate to the larger site in which the submitted site sits and which was assessed as part of the SHLAA 2011.
- 5.6 We note that the text which accompanies Table C of the SA states that it presents an appraisal of all site options in terms of all the appraisal criteria set out previously within the SA. However, it also states the following:
- “To reiterate, this table is presented for completeness. It is recognised that only limited understanding can be gained from strict GIS analysis; and equally it is recognised that presenting appraisal findings for all site options in tabular format is in practice of limited assistance to those interested in the spatial strategy”.
- 5.7 We note, for example, that Site ID 219 has been assessed as performing “particularly poorly” against the Conservation Criteria, simply by virtue of being in the Conservation Area. We would question the robustness of such an approach.
- 5.8 We have been unable to identify the justification within the SA for the failure to include land adjacent to Rayleigh Road, Hutton as site for residential development in the DLP.
- 5.9 Further, as set out earlier within this representation within section 4, the site is considered to be a sustainable location for development and the SA should reflect this in its assessment of the site.

6 OVERVIEW AND CONCLUSION

6.1 As set out within this representation, there are significant concerns with the current direction being taken in respect of the Brentwood Local Plan. If the Local Plan were to proceed along the lines of the DLP it is considered unlikely to be found sound.

6.2 However, there are still opportunities for the Local Plan to be made sound. The following provides a summary of the suggested amendments be made to the next iteration of the plan to achieve this:

- Review the current proposed number of homes to be provided 2013-2033 having regard to market signals and unmet housing need within areas with which the Borough is connected, to be determined through further working under the Duty to Cooperate with relevant Authorities.
- Ensure that the Local Plan does not rely on the delivery of Dunton Garden Hills Village or windfall to meet housing needs, due to considerable uncertainty regarding their potential to deliver housing.
- Reduce reliance on large strategic sites that will not be delivered in the short-term, and seek to address the current, urgent housing need through the identification of a range of smaller, deliverable sites in sustainable locations; and ensure the provision of a five-year housing land supply.
- Apply a more sophisticated and transparent approach to site selection (and Sustainability Appraisal of potential sites) that considers the sustainability and deliverability of sites, along with their potential to relate to a spatial strategy for development linked to the settlement hierarchy.

6.3 It is submitted that land adjacent Rayleigh Road, Hutton should be allocated for residential development as part of a sound Brentwood Local Plan. As set out in this representation, it is considered a sustainable, suitable and deliverable site that would help meet the current, urgent housing need in the Borough and contribute to a sustainable pattern of growth.