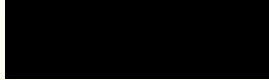


Planning Policy Team  
Brentwood Borough Council  
Town Hall  
Ingrave Road  
Brentwood  
Essex  
CM15 8AY

  
[www.persimmonhomes.com](http://www.persimmonhomes.com)

23rd March 2016

## **BRENTWOOD DRAFT LOCAL PLAN**

Persimmon Homes welcomes the opportunity to comment on Brentwood's Draft Local Plan.

Brentwood Borough Council is consulting on their Draft Local Plan which seeks to guide development in the Borough for the period of 2013 to 2033. Brentwood's latest Local Development Scheme (LDS) which was published in July 2015 targets adoption of the Local Plan for Q2 2017. Should the council keep to these timeframes then this will provide a 16 year period from adoption which meets the requirements of paragraph 157 of the National Planning Policy Framework (NPPF). Persimmon Homes is therefore supportive of the period proposed for the new Local Plan.

Brentwood Borough Council consulted on their Preferred Options document in summer 2013. Due to increases in the Council's objectively assessed needs (OANs) the Council consulted on a Growth Options document in early 2015 to identify further land with potential for development. Both documents provide the base for the Draft Local Plan that is currently being consulted on.

### **Spatial Policies**

#### *Policy 5.1 Spatial Strategy*

This policy seeks to focus new development on land within the Borough's Transport Corridors. Brentwood and Shenfield will be the focus for development in the A12 Corridor supported by two strategic allocations in the A127 Corridor, bringing forward new homes and jobs.

This spatial approach is considered by the Council as the most suitable and has been subject to Brentwood's previous consultation documents. Persimmon Homes is supportive of the Council's approach to focus development around the Borough's main transport corridors as this often offers the most sustainable locations in terms of settlement size and existing service and facilities to support new growth.

#### *Policy 5.2 Housing Growth*

This policy seeks to deliver 7,240 new homes or 362 dwellings per annum (dpa) between 2013 and 2033. Brentwood published their new Strategic Housing Market Assessment (SHMA) in 2014 which identified a requirement for 362 dpa over the period 2015 to 2030.

However, Brentwood Council's latest Annual Monitoring Report (AMR) which was published in November 2015 identifies that only 264 dwellings were completed between in the year 2013/2014 and 2014/2015. This is a shortfall of 460 dwellings over the 2 year period. The Draft Local Plan does not appear to make any allowance for this shortfall. The NPPF requires Council's to make up for any shortfall in their projected housing targets and Persimmon Homes does not believe that Brentwood have sought to do this and therefore is considered unsound.

The Council's SHMA concludes that the Brentwood Borough can be considered a self-contained housing market area. Persimmon Homes would disagree with this assumption. Brentwood Borough is geographically located within easy access to London and the M25 making it a popular place for commuters. The opening of CrossRail in 2017 will further increase the attractiveness of the area for commuters and lead to a rise in house prices. This should be considered in determining housing needs in the borough for the 20 year period.

With London not being able to meet their own housing needs, it is likely that the LPAs surrounding the Greater London Authority (GLA) will be required to make up this shortfall. The GLAs OANs amount to 49,000 dwellings over 20 years, and up to 62,000 in the initial years of the plan in order to address the historical shortfall. The Further Alterations London Plan (FALP) only targets to deliver 42,389 dwellings of the plan period (2011 - 2031).

During the examination the Inspector expressed doubts that the resulting shortfall could be met by relying on co-operation between boroughs or by increasing housing densities. The inspector said that *"it is not easy to see where London boroughs would find additional sources of supply"* and warned that, in finding solutions to meeting the pressing need for housing, *"care must be taken not to damage [London's] environment such that it becomes an unpleasant place to visit, live and work"*. The Inspector recommended that the alterations be adopted despite his reservations, noting that non adoption would *"result in the retention of the existing housing targets"* of 32,210 dpa, which he said were *"woefully short of what is needed"*. The Inspector recommended that the mayor of London may need to explore the possibility of *"engaging local authorities beyond the GLA's boundaries in discussions"* to ensure that the capital's housing needs could be met.

Paragraph 47 of the NPPF requires LPAs to meet their full OANs. Whilst this may be considered their OANs within their own market area, they do not appear to have had any regard for the GLA housing market. Persimmon Homes would strongly suggest that Brentwood need to consider the wider implications of the projected shortfall in housing delivery in the GLA, the interaction between London and commuter areas such as Brentwood, the role the authority should be playing in assisting meeting the capitals housing needs.

The inclusion of reserved sites can assist. They can be called upon if and when the Borough's OANs change and/or the Council can not demonstrate a 5 year housing land supply. This will ensure that the Local Plan continues to meet the Boroughs housing needs until 2033.

## **Managing Growth**

### *Policy 6.1 Sustainable Development*

This policy seeks to comply with paragraph 14 of the NPPF which promotes the presumption in favour of sustainable development. Policy 6.1 states that *"planning applications that*

*accord with policies in this Local Plan (and where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise”.*

Persimmon Homes supports the inclusion of this policy within the Local Plan. In order to maintain a 5 year housing land supply and protect the Borough from speculative applications, the Council need to ensure that applications are determined without delay. The council should seek to work proactively with developers, landowners and agents to ensure that sites identified for development in the Draft Local Plan which are progressed through to adoption can be delivered within the specified timeframes.

#### *Policy 6.2 Managing Growth*

This policy seeks to manage growth within the Borough and ensure that local meets are met by the proposed allocations. The sites location, existing services and facilities and infrastructure requirements will be considered in their delivery. The Council should actively work with the developers, landowners and agents for the proposed allocations to ensure that this policy can be properly implemented and adhered to by both the Council and the developer and ensure that sites can be delivered within the specified timeframes to maintain a 5 year land supply.

#### *Policy 6.4 Effective Site Planning*

This policy states that *“development proposals will be favourably considered where the planning and design of buildings and spaces:*

- 1. Arrange access points, routes within the site, public and private spaces, building forms and ancillary functions;*
- 2. In an efficient, safe, workable, spatially coherent and attractive manner;*
- 3. incorporate existing features of value;*
- 4. design out opportunities for crime and anti social behaviour; and*
- 5. safeguard the amenities of occupiers or any nearby properties by ensuring that their character and appearance is sensitive to the context and surroundings”*

Persimmon Homes would suggest that the above points are principles of design and not effective planning. Paragraph 17 of the NPPF encourages the effective use of land to meet housing needs. Whilst this relates to brownfield sites, the same approach should be adopted for green field sites. This will ensure that sites are maximised to their full potential and minimise the need to release further Green Belt sites to meet housing needs.

#### *Policy 6.6 Strategic Sites*

This policy identifies 3 strategic sites to meet housing, employment and retail needs in the Borough. Persimmon Homes wishes to comment on the Housing led scheme ‘Dunton Hills Garden Village (Policy 7.1)’. Persimmon Homes’ comments in relation to this policy are provided later in this response under the specified section for Policy 7.1.

### **Sustainable Communities**

#### *Policy 7.1 Dunton Hills Garden Village*

This policy seeks to allocate land to east of West Horndon for a new large scale development which will deliver up to 2,500 new homes. The allocation will be required to following the Garden Suburb Principles and a masterplan will be produced to inform the design.

Persimmon Homes supports the inclusion of this policy to meet the Borough's housing needs which is also promoted through paragraph 52 of the NPPF states that *"the supply of new homes can sometimes be best achieved through planning for larger scale development"*.

Brentwood has previously consulted on a cross boundary development with Basildon Borough Council termed the 'Dunton Garden Suburb'. The document consulted on the potential delivery of between 4,000 to 6,000 new homes, along with new employment land, social infrastructure and public open space. Basildon's Draft Local Plan (2016) concluded that this idea has not been progressed due to the lack of technical work undertaken to support the delivery of development in this location.

However, Persimmon notes that Basildon's Draft Local Plan (2016) seeks to allocate and safeguard land to the west of Basildon for up to 2,350 dwellings. The allocation covers land right up to the authority boundary between Brentwood and Basildon and therefore the proposed allocation by policy 7.1 could result in coalescence. Brentwood and Basildon Council should work together to ensure that development in this location has regard to (a) neighbouring allocations, (b) cumulative impacts and mitigation, (c) that the totality of development is deliverable.

The consultation on the new Lower Thames Crossing identifies land in this location for Option C Route 4. Should this route be the preferred location for the new Thames Crossing then a significant area of this land will be safeguarded for that purpose, severely impacting upon the deliverability of the proposed allocation. The Draft Local does not provide detail on how the Council will overcome this issue should Route 4 be progressed. The Council should identify reserved site(s) that can be called upon if (a) the allocation does not come forward or (b) the Council can not demonstrate a 5 year housing land supply. This will ensure that the Local Plan continues to meet the Boroughs housing needs until 2033.

#### *Policy 7.2 Housing Mix, Types and Tenures*

This policy will require residential development to provide an appropriate mix of dwelling types, sizes, tenures and specialist accommodation. Developers will need to have regard to the Council's latest SHMA and the Council's Housing Strategy. The use of two documents to determine the appropriate mix of dwellings, including types, size and tenure can result in conflicting evidence, which can create uncertainty as to what the policy requires and potential for inconsistent application of the policy. The policy should be reworded to say *"that proposals should have regard to the Council's most up to date housing needs"*, whether it be the SHMA or the Council's Housing Strategy.

Brentwood's SHMA identifies a higher need for 1 and 2 bed units (65%) while the remaining should be larger 3 and 4 bed units. With affordability in the Borough decreasing, it is imperative that the council look to deliver smaller market dwellings which are affordable for first time buyers who may not necessarily be eligible for an affordable tenure unit. The delivery of 1 and 2 bed units in favour of larger units will contribute towards helping with affordability in the Borough.

The draft policy also requires developments of 20 dwellings or more to provide a minimum of 5% of dwellings that are suitable or easily adaptable for occupation by the elderly or people with disabilities. This is formally referred to as Lifetime Homes.

The policy further requires development of 100 or more dwellings to provide a minimum of 5% self build properties. The document does not offer any detail of the evidence base to justify the need for self build units and assess the impact upon development viability. There is no evidence as to how many self build units are currently being erected. Given that there is presently no requirement as part of major developments, it is feasible that many small scale and windfall developments would fall within the definition of self built. The reliance on these as part of major developments is that the land may be put aside for them, with delivery being slow; therefore affecting the council's housing trajectory and 5 year housing land supply. The council should look to allocate smaller sites which will deliver 100% self builds and not be reliant on developers and landowners to deliver the land as part of their proposals.

Persimmon Homes can not support this policy at this moment in time. The council have not considered the implications of providing self builds on major developments, both in terms of need, impact upon housing land supply and development viability. There is also confusion around what the council will deem the most appropriate housing mix and the consistency in which this policy will be applied to residential developments.

#### *Policy 7.3 Residential Density*

This policy seeks to achieve a minimum density of 30 dwellings per hectare net or higher unless the special character of the surrounding area suggests that densities would be appropriate. Paragraph 17 of the NPPF encourages the effective use of land. Whilst this policy relates to brownfield land, the same approach should be adopted for green field land. This will ensure that greenfield sites are maximised to their full potential and reduce the need to release further land from the Green Belt for development.

Persimmon Homes is supportive of the adoption of a minimum density policy. However, if the developer can demonstrate that a site can take a higher density without causing significant harm to the landscape then this should be supported to ensure that effective use of both brownfield and greenfield sites is achieved.

#### *Policy 7.4 Housing and Allocations*

This policy seeks to set the strategy for the delivery of the Borough's housing allocations. Proposals for housing submitted on these allocations in accordance with the phasing indicated, will be approved where the proposed scheme is in accordance with other relevant policies in the Plan.

The policy allows for applications in advance of its phasing on where:

- Early release would not prejudice the delivery of other allocated sites;
- The site is required now to maintain a 5 year land supply of deliverable sites;
- Infrastructure requirements of the development can be fully and satisfactorily addressed.

This policy should provide details of how regularly the Council will assess the Borough's current situation to determine whether there is a need to bring forward sites ahead of their phasing for development. This will ensure that the council can demonstrate a robust 5 year housing land supply and not open themselves up to speculative applications.

### *Policy 7.5 Affordable Housing*

This policy seeks to deliver 35% of all housing for affordable tenure. The policy requires the exact mix to have regard to policy 7.2. Persimmon Homes reiterates its concerns in relation to the use of two documents in determining the most appropriate mix and the consistency in which this policy will be applied to residential development.

Policy 7.5 offers no reference on the Council's approach to the Starter Homes Initiative. In March 2015 Central Government published a statement promoting the need to deliver starter homes which would enable first time buyers to purchase a new home at 80% of the open market value. Persimmon Homes is supportive of the push towards Starter Homes and believes it should be included as part of this policy. Whilst it is not clear as to how the Government fully intend to implement this approach, Policy 7.5 should have regard to National Policies approach in delivering affordable housing.

### *Policy 7.8 Housing Space Standards*

This policy seeks to apply the National Described Space Standards to all new housing developments. In order to require internal space standards Local Planning Authorities (LPAs) have to take into account the following:

- Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- Viability – the impact of adopting the space standard should be considered as part of a plans viability assessment with account taken of the impact of potentially larger dwellings on land supply. LPAs will also need to consider impacts on affordability where a space standard is to be adopted.
- Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisition.

There does not appear to be evidence of work undertaken by Brentwood which assesses the need, viability and timing of adopting internal space standards. In light of this, it is not clear as to the rationale for the need for this policy; the impact upon the viability of development alongside the cumulative impact of other policies that place a financial burden on the development and the policy is silent on timing and any transitional period. For these reasons, policy 7.8 is considered unsound.

## **Quality of Life and Community Infrastructure**

### *Policy 10.2 Parking*

This policy seeks to achieve provision for car parking, provision for disabled parking and provision for safe and secure parking for bicycles, in accordance with the latest adopted Essex Parking Standards, and any future iteration of these standards, once adopted by the Council.

The Essex Parking Standards seeks to achieve 1 space for 1 bedroom properties and 2 spaces for 2 or more bedroom properties. A large amount of Essex's Local Planning Authorities have

already adopted these standards. Persimmon Homes supports this approach to adopt the same standards to create consistency between local planning authorities. However, Brentwood should be flexible in their approach to how these standards are met and the layout in which spaces are provided as part of a development and have regard to the sites location and proximity to existing public transport, with highly sustainable locations being allowed to provide reduced levels of car parking.

#### *Policy 10.4 Design*

This policy requires all new development to be high quality and well designed in its own right. Persimmon Homes recognises the need for high quality schemes and therefore supports the inclusion of this policy within the Draft Local Plan. However, the Council must have regard to site specifics and viability. This can be overcome through the Council actively working with the developer to progress masterplans and applications. Persimmon Homes would suggest that these discussions are begun at this stage to ensure that sites can be delivered within the specified plan period, particularly in the earlier years of the plan period.

#### *Policy 10.8 Open Space in New Development*

This policy will require new development to provide functional on-site open space and/or recreational amenities or where appropriate, financial contributions towards new or improved facilities nearby. This policy allows for flexibility with the amount and type being determined by the size, nature and location of the proposal. Persimmon Homes is supportive of this approach and believes developments which effectively use the land are delivered in line with paragraph 17 of the NPPF.

#### **Conclusion**

Persimmon Homes acknowledges that the Draft Local Plan meets the OANs identified in the SHMA. However, it is considered that the Council have not properly considered the impacts of the wider housing shortage in London and the resultant demand on neighbouring LPAs outside of the GLA. Persimmon Homes would suggest that the Council re-look at their housing numbers to ensure that the emerging Local Plan meets the needs of the borough up until 2033.

The Draft Local Plan is reliant on the release of Green Belt land to the west of Horndon to deliver 2,500 new homes (Policy 7.1 Dunton Hill Garden Village). This equates to 34% of the Borough's housing needs. As detailed in our response, Persimmon Homes is concerned that the Draft Local Plan does not have any regard to the new Lower Thames Crossing Option C Route 4 which would see the new crossing in this location. The council need to consider the implications if Highways England choose to progress this option, which it would appear to date they have not.

At this moment in time, Persimmon Homes would suggest that the Local Plan would be found unsound by an Inspector as it does not properly consider the cross-boundary issues and therefore may not be meeting its OANs in full which is a key requirement of the NPPF.

Yours sincerely

**Persimmon Homes Essex**