



**BRENTWOOD  
BOROUGH COUNCIL**

## Draft Local Plan

**2013 - 2033**

February 2016

## COMMENT FORM

From 10 February to 23 March 2016 we are consulting on the Draft Local Plan for Brentwood Borough. You can view and comment on the Draft Local Plan online at [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)

Alternatively, please use this form to share your views on the contents of the Draft Plan.

All responses should be received by Wednesday 23 March 2016

Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email them to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

### Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form you are agreeing to these conditions.

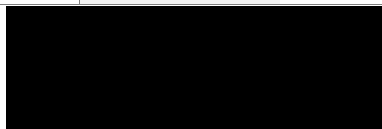
### PERSONAL DETAILS

Title: Ms

First Name: Sara

Last Name: Sweeney

Address:



Post Code:



Telephone Number:



Email Address:



## YOUR COMMENTS

**Please indicate which section(s) of the Draft Local Plan you are commenting on** (where applicable please clearly state the Policy reference or paragraph number):

Kitewood Estates Ltd. ('Kitewood') welcome the opportunity to consult on Brentwood Draft Local Plan (2013-2033).

Kitewood is a privately held property development company that has extensive experience of delivering well-conceived residential, mixed-use, employment and extra-care developments in both the private and affordable sectors throughout London and the South East.

The government recognises that there is a national housing shortage, therefore one of the greatest issues facing local planning authorities in the South East of England is housing need. This representation will therefore be confined to the discussion on the housing target and housing strategy for the plan period.

### **Objectively Assessed Need (OAN) for Housing**

The National Planning Policy Framework (NPPF) places great emphasis on the need to boost significantly the supply of housing (Para 47, NPPF). Local planning authorities should use the evidence base to ensure that the Local Plan meets the full *Objectively Assessed Need (OAN)* and furthermore, there is a legal requirement for local planning authorities to consider all reasonable alternatives on how to deliver this need.

Specifically in relation to plan-making, local planning authorities should ensure that the Local Plan base is up-to-date (Para 158, NPPF), as this will be the starting point in the process. The Planning Practice Guidance (PPG) elaborates on this and requires that the starting point for determining the OAN should be derived from the most up to date population figures.

The most up to date population figures are DCLG's 2012-based household projections (DCLG 2012) which were published in Feb 2015. We understand that the Council's '*Objectively Assessed Housing Needs for Brentwood: Moving Towards a Housing Target*' (Dec 2014) report ("OAN report") pre-dates the release of the 2012 household projections by the DCLG.

The DCLG 2012 Household Projections is the benchmark baseline position against which to scrutinise the other scenarios which are modelled. The DCLG 2012 Household Projections indicate that 300 households will form each year for the period 2013-2033 and is therefore the benchmark. The OAN report pre-dates the release of the 2012 Household Projections however, we acknowledge that the Council has made an attempt to model what these most recent 2012 population projections might indicate. Under the Council's modelling using the 2012 SNPP, it generates a demographic projection of 340 households per annum (hpa). Modelling different headship rates from the household projections, appears to be a reasonable methodological approach.

The plan will make provision for 7,240 homes over the period 2013 to 2033 and this equates to an annual average of 362 homes. Albeit, it is not entirely clear from the OAN report how the Council decided to progress a housing target 362 dwellings per annum (dpa) and this should be clarified

moving forward. With that being said, it does appear that the starting point for Brentwood is to meet the lower OAN.

### **Duty to Cooperate (Para 2.22)**

The OAN report states (para 2.10) that “*Brentwood is seeking to accommodate all its need within its own boundary and no potential HMA partner has requested that the Borough help meet their unmet need*”.

Brentwood Borough has strong inter-connectivity with London and Essex and therefore could not be considered a self-contained Borough. There appears to be strong commuting flows with Basildon and Chelmsford, and the construction of Crossrail (strategic objective S07) will only increase this connectivity with London and Essex. On that basis, we consider that Brentwood should consider a joint-SHMA with Basildon, Chelmsford and Epping Forest to establish the overall OAN for the HMA and how the overall OAN can be collectively met.

Furthermore, the effect of London migration and London’s unmet housing need does not appear to have been fully considered and the current housing target does not appear to allow sufficient headroom for any changes in the predications for growth and migration that may occur during the plan period.

It is not clear from the draft Local Plan and the supporting evidence base whether or not the Council has fully considered London migration and this is therefore contrary to NPPF para 158 which states that should take into account “migration and demographic change”. The Inspector’s report (dated 18 November 2014) for the London Plan does refer to the London migration effect and these assumptions are therefore likely to be material to the preparation of local plans outside London.

We note that Paragraph 2.10 of the OAN report does acknowledge the potential problem of London however, it states that it is unable to assess the implications of the Mayor’s new plan until this adopted (paragraph 6.18). If the implication of the Mayor’s new plan has not been fully considered, then the OAN figure of 360 dpa would appear to be subject to change once the Mayor’s new plan has been adopted.

There is also a gap between London’s OAN and the housing targets being carried forward in some London Boroughs, resulting in a supply deficit of around 7,000 dwellings per annum. With or without the introduction of Crossrail, Brentwood has good connectivity with London and the issue of London’s unmet need should not be avoided because it could be considered additional to the issue of the migration effect.

### **Green Belt (Para 2.60)**

The Council’s consultation document (para 2.60) states that 89% of the total land mass of Brentwood Borough is currently designated Green Belt, and consequently it is a designation that will have a large influence on how the district develops.

It is for local authorities to define and maintain Green Belt land in their local areas, albeit the NPPF states that Green Belt boundaries can be altered as part of the plan review process having regard to their intended performance in the long term (Para 83).

We acknowledge that a proportion of the Green Belt protects Brentwood’s high quality environment but, it does as the Council states constrain development opportunities, making it difficult to meet

development needs in full. However, there are likely to be many sustainably located sites that do not fulfil the five purposes of the Green Belt as set out in Para 80 of the NPPF, and should therefore be considered for release as part of the plan-making process. The Council should also consider the release of reserve sites for release beyond the plan period or in the event that the proposed allocations fail to deliver.

### **Spatial Strategy (Policy 5.1)**

It is positive that the Council will release Green Belt land (albeit “limited”) for development within transport corridors, in strategic locations and urban extensions. However, there are further areas that should be considered for release from the Green Belt to allow a flexible approach for expansion greater than that, which has already been considered in the Council’s OAN projection.

### **Housing Growth (Policy 5.2)**

Overall, Kitewood suggest that the best approach for the Council to maintain a deliverable five year housing land supply against the up-to-date OAN, is to ensure the release of a range of sites, of varying sizes, in several locations. To ensure delivery, especially within the first five years of the plan, strategic scale allocations should be balanced with smaller sites.

We acknowledge that the full housing target is proposed to be met and that a significant percentage of the target is proposed to be met by Brownfield Green Belt (urban extensions), Strategic Sites (Green Belt) and Greenfield urban extension in the Green Belt. Whilst this is a positive step, there does not appear to be enough “fat” in the proposed allocations to make allowances should any of the allocations fail to be delivered during the plan period and furthermore, there does not appear to be any built in ‘future proofing’ for beyond the plan period.

We are very concerned about the Council’s overreliance on windfalls sites. There is a presumption that 14% of development will result from windfall development coming forward during the plan period, and this does not appear to be adequately justified. Windfalls should boost the supply of housing rather than form the starting point for fulfilling the OAN. We are of the opinion that the reliance on windfall sites is inappropriate and therefore not fulfilling the objectives of NPPF para 182.

It is also of great concern to us that the Dunton Garden Village (strategic site) development is proposed to accommodate 35% of the total housing requirement. This appears to be risky strategy and could result in a significant shortfall in the supply of housing if it is proved undeliverable. There also appears to be a lack of cross-boundary co-operation between Brentwood and Basildon Borough Council on this matter. The Basildon Consultation 2016 (Policy H10) confirms that insufficient evidence has been prepared to demonstrate that the Dunton Garden Village is appropriate or deliverable in the plan period.

National planning policy places great emphasis on Local Plans achieving sustainable development as out in Para 151 of the NPPF. The housing growth strategy and in particular the allocation of brownfield sites within the Green Belt do not appear to have considered the appropriateness of those locations for residential development. We therefore consider the decision to allocate brownfield Green Belt sites as opposed to greenfield Green Belt sites as arbitrary because there are no clear justifiable reasons to suggest that these sites are any more sustainable or that their development would be in-keeping with the local character or settlement form.

We consider that it would be a positive step for the Borough Council consider further sites to ensure that the full OAN is met and that a flexible approach to housing delivery is enabled. As set out

above, we are of the opinion that the Council should embark of a joint SHMA with the neighbouring Authorities and that the OAN should fully consider the London migration effect and the issue of London's unmet need.

The Borough is highly constrained by Green Belt but it is imperative that a full Green Belt review is undertaken to identify additional sites that could be considered for release in the medium and longer term.

**Land at Honeypot Lane, Brentwood (Site: 022)**

Whilst we support the removal of this site from the Green Belt and its proposed allocation for around 250 dwellings, we are of the opinion that '*Land to the rear of BT officers*' (15.6ha) offers the opportunity to infill development contained within the urban area of Brentwood. The site should therefore be allocated as a suitable site to fulfil the policy expectations set out in Policy 5.1.

In conclusion, Kitewood do not consider the draft Local Plan, in its current form to be "sound" and urge the Council to consider further allocations to ensure that the OAN is fulfilled throughout the plan period.

**Please specify if you Support, Object or are providing a General Comment:**  
(tick as appropriate)

Support

Object

General Comment

**Comments** (please use additional sheet if required)

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