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Planning Policy
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Brentwood Local Plan: Preferred Site Allocations Local Plan

Thank you for allowing Persimmon Homes the opportunity to comment on;

1. Brentwood Local Plan: Preferred Site Allocations Local Plan (to 2033)
2. Supporting evidence base

Persimmon Homes are one of the UK's leading builders of new homes with a track record of delivery in the Essex and wider Eastern region. Persimmon Homes are a developer with significant experience of market and planning issues in the area, as well as being a 'user' of the Development Plan.

Persimmon Homes are a Member of the House Builders Federation (HBF), the principal representative body of the house building industry in England and Wales. Persimmon Homes, together with other Members, have inputted into the HBF's representations.

The below comprises Persimmon Homes representation to the Preferred Site Allocations Local Plan.

Duty to Co-operate & London

Despite the Emerging London Plan expectation that London will deliver 65,000 each year from 2019-2029, there will be a need for LPAs with strong commuting and migratory links with London, such as Brentwood, to consider how it can address unmet housing needs arising from the capital. It is considered that further evidence is needed in regard to the exercising of the Duty to Co-operate and the extent to which Brentwood should assist London meet its needs both prior and post 2029.

Essex

Local Authorities comprises Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea, Thurrock and Essex County Council have formed the Association of South Essex Local Authorities (ASELA). We note that as of the end of 2017 ASELA have prepared a Memorandum of Understanding (MOU). Part of the aims of ASELA is to

'Open up spaces for housing, business and leisure development by developing a spatial strategy'.

It is evident from the experience at Castle Point that certain authorities have expressed a desire not to meet their full OAHN. It remains to be seen the establishment of this body will provide effective governance and a mechanism by which to ensure genuine co-operation to meet full OAHN. Many adjoining authorities within the northern part of Essex have not had to factor in meeting housing growth from ASELA Authorities and are significantly more advanced with their development plans than the majority of South Essex Authorities.

Housing Needs

We agree with the HBF that Brentwood should look at the implications of the Governments published draft standard methodology. It is the intention of Government to introduce the standard methodology for housing needs. To advance a sound plan and one that seeks to address the Housing Crisis, the draft Plan should factor in the emerging government advice and policies. We consider it appropriate that given the significant affordability issues that the Council applies an uplift of at least 40%.

The Government's proposed standardised objectively assessed housing needs methodology indicates a need for Brentwood to deliver a capped figure of 454 dwellings per annum. It is considered that the plan should seek to address this figure. This would give rise to an extra 1,480 homes during the plan period.

Housing delivery

There is presently a distinct lack of published supporting technical studies in relation to the Dunton Hills Garden Village as proposed in the Local Plan. Furthermore, there is insufficient evidence of co-operation with and a joint vision Basildon & Thurrock Council's with regards the Garden Village, how it will be delivered having regards to the neighbouring authorities aspirations for growth in this area.

It is noted that the Council are exploring whether Dunton Hills Garden Village could increase delivery from 2500 to 2033 to c4,000. It is considered that this work should have been undertaken in advance of the consultation and the findings inform the Preferred Options.

The draft plan is heavily reliant upon sites that currently have beneficial uses, including;

- Ford Offices 117A / 117B,
- Railway Station car park ref: 002,
- William Hunter Way car park ref 102,
- West Horndon Industrial Estate 020, 021 152.

Whilst Local Plans need to be aspirational, they also need to be realistic. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. Sites with current beneficial uses, if deliverable, are likely to be more difficult and therefore slower to deliver. They will have established use values that will influence whether they are brought forward for residential development. In addition, brownfield site are likely to be subject to additional costs in terms of relocating businesses, demolition, and remediation that

may impact viability. The Council need to robustly assess its assumptions with regard the extent to which sites with current beneficial uses will be deliverable and can viably contribute towards meeting housing need, including that for affordable housing.

We are concerned that the Local Plan is too heavily reliant upon sites that may not deliver and if they do, may not assist in terms of boosting housing land supply or deliver the levels of affordable housing needed.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation.

Yours faithfully



David Moseley
Planning Manager, Persimmon Homes Essex