



MARCH 2019

Representations to Brentwood Local Plan 2016 – 2033

Land West of Thorndon Avenue, West Horndon

Iceni Projects Limited on behalf of
Estates & Agency Strategic Land

March 2019

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Plan 2016 – 2033**

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EXECUTIVE SUMMARY

These representations detail how the Brentwood Pre-Submission Local Plan, as it is currently prepared, fails to meet the soundness test set out in para 35 of the National Planning Policy Framework.

The Framework is clear that where the plan-maker has identified that exceptional circumstances exist to release land from the Green Belt the 'first consideration' should be given to land which is '*previously developed and/or well-served by public transport*'. The Plan itself seeks 'transport-orientated growth.' The subject land at West Horndon is considered the most sustainable undeveloped site in the borough given its proximity to West Horndon rail station (one of just four rail stations in the borough) which is wholly underutilised infrastructure. The site is self-contained with strong defensible boundaries, enclosed by existing industrial and residential development and roads. There is no technical evidence accompanying the Local Plan which identifies any fundamental constraints in bringing this site forward. Notwithstanding the above, Brentwood Council remain steadfast against allocating the land in the current Local Plan. The Plan fails the test of soundness in this respect as it is not consistent with national policy.

The assertion that Brentwood is a self-contained HMA is highly questionable. In any event this does not preclude Brentwood from accommodating unmet housing needs from either London or other adjoining authorities in Essex. These representations identify the extent of unmet need in adjoining boroughs including Basildon, Havering and from the London Plan, particularly in the short to medium term which the Brentwood Local Plan fails to address. On this matter the Draft Local Plan fails the soundness test as it is neither justified nor effective in terms of cross boundary strategic matters.

Aside from unmet housing need in adjoining boroughs it is considered that Brentwood has significantly under estimated its own housing need having failed to take account of the 'uncapped' housing requirement and the effects of Crossrail. Furthermore, the proposed stepped housing trajectory is unjustified and simply reinforces the affordability challenges in the borough which need to be urgently addressed. From a review of the evidence it is considered that the Council cannot demonstrate a Five-Year Housing Land Supply. Moreover, there are a range of delivery issues with the housing trajectory for the first five year of the plan period which further demonstrates that the Council need to allocate additional land in order to meet their housing requirements.

Furthermore, Icenii consider that Brentwood Borough Council has under estimated the need for B class employment land in the Borough, and that its employment land supply is insufficiently flexible. Land at Thorndon Avenue, West Horndon could support new employment provision including a data centre and other B-class uses incorporated as part of the overall mixed-use development, meeting an identified need; supporting flexibility of supply and also contributing towards local employment

generation and supply for local businesses, mitigating the impact of the loss of the West Horndon Industrial Estate for new residential development.

The Council's spatial strategy seeks to accommodate growth in locations which are sustainable and will maximise the value of railway connectivity. However, the spatial strategy also details that the sequential approach to allocating development was adopted. The sequential test methodology proposes after urban and brownfield sites, growth should be focused on strategic sites (removed from existing services and infrastructure) and then followed by urban extensions (areas close to existing transport infrastructure). This approach conflicts with the wider policies contained in the Plan which all seek first and foremost to develop land next to existing infrastructure and services, provided there are no detrimental impacts on important environmental designations. In this respect the Local Plan policies conflict with one another.

The evidence base including the Green Belt Study; the Sustainability Appraisal; the Landscape Sensitivity and Capacity Study and the Housing and Economic Land Availability Assessment all support the allocation of the subject land at West Horndon for housing. In fact, the Council's own landscape assessment considers due to the characteristics of the subject site, that it should be prioritised for housing development.

The development of this unfettered site at West Horndon is fully in accordance with the spatial strategy focused on transit – orientated growth and will act as a catalyst for the redevelopment of the Industrial Estate and Dunton Hills Garden Village. The evidence base, particularly the Sustainability Appraisal, does not identify any significant constraints with developing an urban extension at West Horndon, in addition to Dunton Hills Garden Village. If Brentwood is to attempt to meet the housing needs, this approach is required.

The vision of West Horndon (Brentwood lands) is to deliver approximately 900 new homes set within an attractive, landscaped setting defined by new watercourses and water bodies. The development will provide convenient walking and cycling access to West Horndon railway station and a new direct link to Thorndon Country Park in the north. Homes will be centred on a village green which will be fronted by a new primary school, local shops and a care home to provide for everyday needs of new and existing local residents. A new employment area of approximately 4ha in the north-eastern corner of the site will provide much-needed accommodation for local and medium-sized enterprises with visibility and access off the A127.

Unfortunately, EASL is unable to support the Council's plan making decisions as they are not currently based on a sound evidence base and do not meet the NPPF's objective to amend Green Belt boundaries in the most sustainable locations. EASL remain committed to working with the Council to address the failings in the Local Plan.

1. INTRODUCTION

- 1.1 Icen Projects on behalf of Estates and Agency Strategic Land (EASL) welcomes the opportunity to submit representations to Brentwood Borough Council on the Pre-Submission Local Plan (Regulation 19) in respect of land west of Thorndon Avenue, West Horndon.
- 1.2 The representations demonstrate that the allocation of additional land at West Horndon is fully in accordance with national policy. Moreover, the allocation of this site adheres to the spatial strategy of transit-orientated growth at the heart of the Local Plan. An allocation of the land at Thorndon Avenue, West Horndon is compatible with the allocation of the industrial estate and will act as a catalyst for the enhancements to local services and infrastructure required to serve Dunton Hills Garden Village. Moreover, new employment provision incorporated as part of the overall mixed-use development would also contribute towards mitigating the impact of the loss of the West Horndon Industrial Estate for new residential development.
- 1.3 The Council has previously confirmed its support for development of the subject site at West Horndon, detailed as follows:
- **The Brentwood Preferred Options Consultation 2015** stated that *'West Horndon offers potential for sustainable development to the benefit of the local community. As well as meeting the village's longer term needs, developing here provides an opportunity to address current conflicts from competing uses, most notably, heavy freight passing through residential areas; improve the quality of the public realm; provide multi-functional, accessible green space; and strengthen the village centre.'*
 - **The Interim Sustainability Appraisal 2015** determined that the West Horndon Strategic Growth Location in the 2015 consultation was ranked the most sustainable growth option overall.
- 1.4 Since 2015 there has been no material change in circumstances to justify the Council's position to submit a Local Plan which fails to deliver these benefits at West Horndon. In addition, the evidence base, which accompanies the Local Plan, continues to support the allocation of land at West Horndon.
- 1.5 West Horndon is on the c2c Fenchurch Street to Shoeburyness railway line and benefits from a frequent service (4 trains an hour at peak times) connecting the land at West Horndon to the City of London in less than 30 minutes. West Horndon is strategically located to provide a sustainable transport option for a variety of people by its proximity and accessibility to the wider road network and the direct access to London provided by the existing train station.

1.6 EASL additionally has an interest in land to the south of West Horndon, which lies within Thurrock Council boundary. Thurrock Council has identified the land to the south of West Horndon as having the potential to accommodate a new settlement (10,000 homes) or a small urban extension (1,500 homes) as part of the emerging Thurrock Local Plan. Both options have the potential to deliver a link road to A128 which will enable the creation of a loop route to connect Dunton Hills Garden Village to the station without the need for all traffic to come through the existing village. A Delivery Statement prepared by EASL in response to the Thurrock Issues and Options Consultation (December 2018) is attached at Appendix 1.

1.7 This submission on the Regulation 19 Local Plan should be read alongside the following representations submitted by EASL:

- Brentwood Issues and Option Consultation (November 2009)
- Brentwood Preferred Options Consultation (July 2013)
- Brentwood Council Strategic Growth Options (January 2015)
- Brentwood Draft Local Plan (January 2016)
- Brentwood Preferred Site Allocations Local Plan Consultation (March 2018)

1.8 These representations are structured as follows:

- Section 2 details the main policies contained within the National Planning Policy Framework including the required approach for plan making in releasing land from the Green Belt;
- Section 3 summarises our latest understanding of regional matters in respect of the Association of South Essex Local Authorities and the preparation of a Joint Strategic Plan;
- Section 4 considers the issue of Duty to Cooperate with a particular focus on the Council's approach to defining the housing market area and the work undertaken with adjoining authorities to meet housing need;
- Section 5 assesses Brentwood's own housing needs and housing land supply;
- Section 6 considers the employment needs within Brentwood borough and demonstrates that there is a significant shortfall in the Draft Local Plan in this respect;
- Section 7 reviews the Council's spatial strategy which emphasises the need to maximise the potential of existing infrastructure and to focus growth on locations which are sustainable;
- Section 8 provides a summary of the main evidence base documents including the Green Belt Assessment, the Sustainability Appraisal and the Landscape Sensitivity and Capacity Study;

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- Section 9 details the vision for West Horndon, and the technical evidence undertaken to date;
and
 - Section 10 contains a summary of the main issues and conclusion.

2. NATIONAL PLANNING POLICY FRAMEWORK

Plan Led Approach

- 2.1 The National Planning Policy Framework (Updated February 2019) states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 2.2 Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment. These policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.

Examining Local Plans

- 2.3 Para 35 of the Framework states that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound.
- 2.4 Plans are 'sound' if they are:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed need; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Green Belt Release

- 2.5 Para 137 of the Framework requires that before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This includes maximising potential of brownfield land, optimising density within urban

areas and discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

- 2.6 Section 13 'Protecting Green Belt land' identifies that Green Belt boundaries can be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. The required process is for strategic policies to establish the need for any changes to Green Belt boundaries and subsequently detailed amendments to those boundaries may be made through non-strategic policies. The Brentwood Local Plan confirms that given the limited brownfield land within the urban areas; the extent of Green Belt land within the borough; and housing need requirement, that the exceptional circumstances required by the Framework to justify changes to Green Belt boundaries can be clearly demonstrated.
- 2.7 The Framework requires at Para 138 that "*Where it has been concluded that it is necessary to release Green Belt land for development, **plans should give first consideration to land** which has been previously-developed and/or is **well-served by public transport**.*" West Horndon benefits from direct access to an existing train station, which will benefit from further investment, and therefore clearly meets this requirement within the Framework. As detailed in these representations the draft Local Plan fails to address this national policy requirement in the identification of land to be removed from the Green Belt and thus fails the soundness test.
- 2.8 The Framework is explicit in the process that Local Authorities must adopt when considering the release of Green Belt land. Brentwood Council have failed to fully adhere to national policy in assessing land to be released from the Green Belt.

Duty to Cooperate

- 2.9 The Framework restates that planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.
- 2.10 Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 2.11 The Framework requires at para 27 that:

"In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These

should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency”.

2.12 The issue of Duty to Cooperate is considered in further detail at section 4 of these representations.

3. REGIONAL / ADJOINING AUTHORITY POLICY MATTERS

Association of South Essex Local Authorities

- 3.1 The Association of South Essex Local Authorities entered into a Memorandum of Understanding (January 2018) setting out their commitment to build on the existing strong foundations of cooperation developed through the Duty to Cooperate, and within the wider context of the South Essex 2050 Ambition to move to a more formal approach to strategic planning. This will be developed through a 'portfolio' of plans, with a Joint Strategic Plan (JSP) setting out strategic spatial and infrastructure priorities that are of mutual benefit, prepared alongside a suite of 'local delivery plans' to manage delivery within each of the local planning areas.
- 3.2 The JSP is intended to provide the 'effective strategic planning mechanism' to ensure compliance with the requirements of the Duty to Cooperate, with the existing joint work, evidence base and shared governance through ASELA demonstrating that cooperation is proactive, positive and ongoing. There is a clear commitment to meeting the full housing needs across the sub-region, the Statement of Common Ground identifies there are no housing allocations set out in the SOCG as this will be determined through the JSP and based on the agreed spatial strategy and updated evidence base. It is not clear to what extent the work with ASELA has influenced the Brentwood Plan making process as it is not detailed in the evidence base.
- 3.3 ASELA have confirmed that they are committed to work collectively in the interests of South Essex detailing that the *"joint spatial plan will provide a strong framework to build on and deliver the sound individual local plans and provide the future strategic context for them"*.
- 3.4 Five areas of strategic importance have been identified by ASELA as places that offer the greatest potential to deliver the South Essex 2050 Ambition, with the right investment and leadership. The 'Strategic Areas of Opportunity' include the A127 Transport Corridor which runs to the north of West Horndon.
- 3.5 ASELA acknowledges that not only is cross-boundary strategic planning of infrastructure and growth a planning requirement, it is also an opportunity. Under the Duty to Cooperate, West Horndon presents the opportunity for wider investment in regards to housing, employment, transport infrastructure, and social infrastructure growth for both Brentwood and Thurrock (also a signatory to ASELA).
- 3.6 The purpose of ASELA and the JSP is to ensure the various authorities fulfil their obligations in relation to Duty to Co-operate and the preparation of a Statement of Common Ground. From the

evidence base presented by Brentwood Council to date it is not clear whether these obligations have been met.

Thurrock Council Emerging Local Plan

- 3.7 Thurrock Council is preparing its new Local Plan, which, when adopted will supersede the Local Development Framework (December 2011). It is anticipated that the Thurrock Local Plan will be adopted in 2022. EASL's land interests in West Horndon extend across Brentwood and Thurrock, with the bulk of the landholding within Thurrock.
- 3.8 The Thurrock Issues and Options Consultation (December 2018) sets out in broad terms the spatial options where new development should be located which includes two options at West Horndon – a new settlement of 10,000 homes and a small urban extension of 1,500 homes.
- 3.9 In terms of opportunities for a new settlement the Consultation identifies the following:
- A limited number of land owners, potentially increasing the deliverability of the project;
 - Potential opportunities to bid for Government funding to support the delivery of strategic infrastructure; and
 - Critical mass of development that could help to secure the infrastructure needed to support the development.
- 3.10 The West Horndon Delivery Statement enclosed at Appendix 1 was prepared in response to this consultation which demonstrates the suitability of this location for a new settlement. EASL also supports the identification, within the Issues and Options Consultation, of a small urban extension at West Horndon. As detailed within the Delivery Statement, this will form the first phase of development at West Horndon. The area to the immediate south of the existing station can be developed without the need for major infrastructure, aside from the new link road to the A128. For this reason, there will be no long lead in time to enable construction to commence onsite and housing, infrastructure and community services can be delivered in the early years of the plan period.
- 3.11 In March 2018 Thurrock Council submitted representations on the Brentwood Draft Local Plan Preferred Site Allocations setting out fundamental concerns regarding the approach adopted by Brentwood. Thurrock Council consider that there are key strategic issues and cross-boundary matters of importance in relation to the preparation of the Brentwood Local Plan that should be addressed through further engagement and collaboration between Brentwood Council and Thurrock Council and with the other South Essex authorities under the Duty to cooperate which include *“The Thurrock Council concerns regarding the justification of Dunton Garden Village and the need to consider of alternative options at West Horndon.”*

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- 3.12 Thurrock Council express serious concern regarding the spatial strategy adopted by Brentwood, stating that:

However Thurrock Council is concerned with regard to the spatial strategy and the levels of growth proposed in the A12 and A127 corridors and considers that Brentwood Council has not thoroughly tested all reasonable options. Thurrock Council also remains concerned about the identification and impact on the Green Belt of the proposed free standing Green Belt settlement of Dunton Hills Garden Village. In addition limited new or updated evidence has been made available to demonstrate the deliverability or viability of such a scheme.

- 3.13 Thurrock Council consider that concentration of development within the Brentwood/Shenfield corridor, along with some Green Belt release at West Horndon, represents the preferred strategy for the Brentwood Local Plan, stating:

*Thurrock Council considers that the most appropriate spatial strategy would be a variation of the previous options with growth including Green Belt release concentrated in the A12 Brentwood/Shenfield corridor but with some potential for Green Belt release at West Horndon.
...*

The Preferred Site Allocations document 2018 identifies there are several sites for development of brownfield land and Green Belt release along the A127. It is considered that brownfield redevelopment and a Green Belt release at West Horndon would represent a suitable scale of housing development in this location.

- 3.14 Thurrock Council expresses its continued concern about the proposed Dunton Hills Garden Village concept and the lack of detailed evidence to justify such a proposal. The issues of concern include there is a lack of technical evidence; the location does not have any public transport; potential cumulative impacts on the gap between Upminster and Basildon, along with growth at West Horndon, Brentwood Enterprise Park and Basildon; a much greater negative impact on the landscape than stated; long infrastructure lead-in times will mean limited housing delivery in the short to medium term; serious questions about the market ability to absorb such a large scheme; impact on Thurrock Housing Market; road traffic impact; and DHGV scores poorly across a range of SA criteria when compared with other sites.

4. DUTY TO COOPERATE ISSUES

4.1 Councils are required to address key strategic matters that cross administrative boundaries through effective joint working as part of the plan making process through the Duty to Cooperate (DtC). The Council's February 2019 Duty to Cooperate Position Statement is clear that meeting housing need in a key strategic matter in these terms.

4.2 The DtC statement is absent in terms of any detailed discussions. Furthermore, contrary to para 27 of the Framework, the Council has failed to prepare a statement of common ground. The National Practice Planning Guidance details that:

"Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated".

4.3 IcenI has significant concerns regarding the effectiveness of cooperation including a) the Council's approach to defining the housing market area; and b) the work undertaken with adjoining authorities to meet housing need.

The Housing Market Area

4.4 The Council maintain that Brentwood forms a single district, self-contained housing market area (HMA).¹ This conclusion is not supported by evidence, and IcenI consider that the borough clearly forms part of a wider housing market area. This is further reinforced by the Core FEMA, which includes Basildon, Chelmsford, Epping Forest, Havering and Thurrock, illustrated on page 15 of the Brentwood Economic Futures 2013-2033 : Final Report.

The 2013 SHMA Report

4.5 The 2013 Strategic Housing Market Assessment (SHMA) was commissioned by Brentwood Borough, along with Braintree, Chelmsford, Colchester and Maldon. It stated that housing market areas are "geographical areas defined by household demand and preferences for housing" and typically comprise an area in which 70% of moves are contained. It set out an expectation that there would be a close relationship between the housing market area and travel to work area (Paras 1.2.2-1.2.3).

¹ BBC Duty to Cooperate Position Statement, Feb 2019, Para 1.24

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- 4.6 The 2013 SHMA defined Brentwood as a self-contained HMA. There was a limited review of this as part of the 2018 PBA SHMA Report. Both reports focus on defining the HMA geography based on analysis on migration and commuting flows, and IcenI has therefore looked in particular at this.
- 4.7 The 2013 SHMA report identified substantial in-migration (4,000 persons in the 2011-12 year) and out-migration (3,700 persons) between Brentwood and other UK local authorities. The analysis of internal migration trends in that report showed:
- A very strong relationship with London, with migration from London to Brentwood exceeding 1,400 persons in a single year (Figure 3-2, p29) with a gross (two way) flow of 1,900 persons;
 - A strong relationship within Essex, with over 600 people moving between Brentwood and Basildon; and Brentwood and Chelmsford in a single year (Figure 3-2, p29). The scale of this relationship was however more modest than that within London, as might be expected given the relative size/population of the respective areas.
- 4.8 The 2013 SHMA Report then considered commuting patterns (Figure 3-4), which showed a very substantial outflow of c. 15,000 persons per day to London; as well as again showing strong relationships with Basildon and Chelmsford. It did not identify what the Travel to Work Area was. IcenI has included at Appendix 2 the geography of Travel to Work Areas (TTWA) defined by ONS which was available at the time of preparation of this report. This shows Brentwood as falling within a “Southend and Brentwood” TTWA.
- 4.9 The report suggests 82.4% self-containment of household moves, drawing on Table 3-3. But this is the proportion of moves which was internal to Brentwood of those moving within the 7 local authorities listed in this table only. This excludes London and Thurrock, which the SHMA itself identified strong migration relationships with.
- 4.10 A 60% commuting self-containment level suggests a substantial level of out-commuting, with the evidence itself showing at least 18,000 residents daily commuting out of the authority to work.
- 4.11 The evidence does not support the conclusions drawn. The scale of commuting and migration relationships shown clearly demonstrates that Brentwood forms part of a larger housing market area. Put simply, the 2013 SHMA’s conclusions that Brentwood forms a single self-contained housing market area are not consistent with the evidence. It is not supported by the evidence in the document, or the Travel to Work geography based on data available at the time of its preparation.

The 2018 SHMA Report

- 4.12 The HMA geography was reviewed in the 2018 Strategic Housing Market Assessment, in Section 3 of that report. This report noted the 2013 SHMA findings but then reviewed the position using 2011 Census data. It focused again on commuting and migration relationships. In assessing commuting it

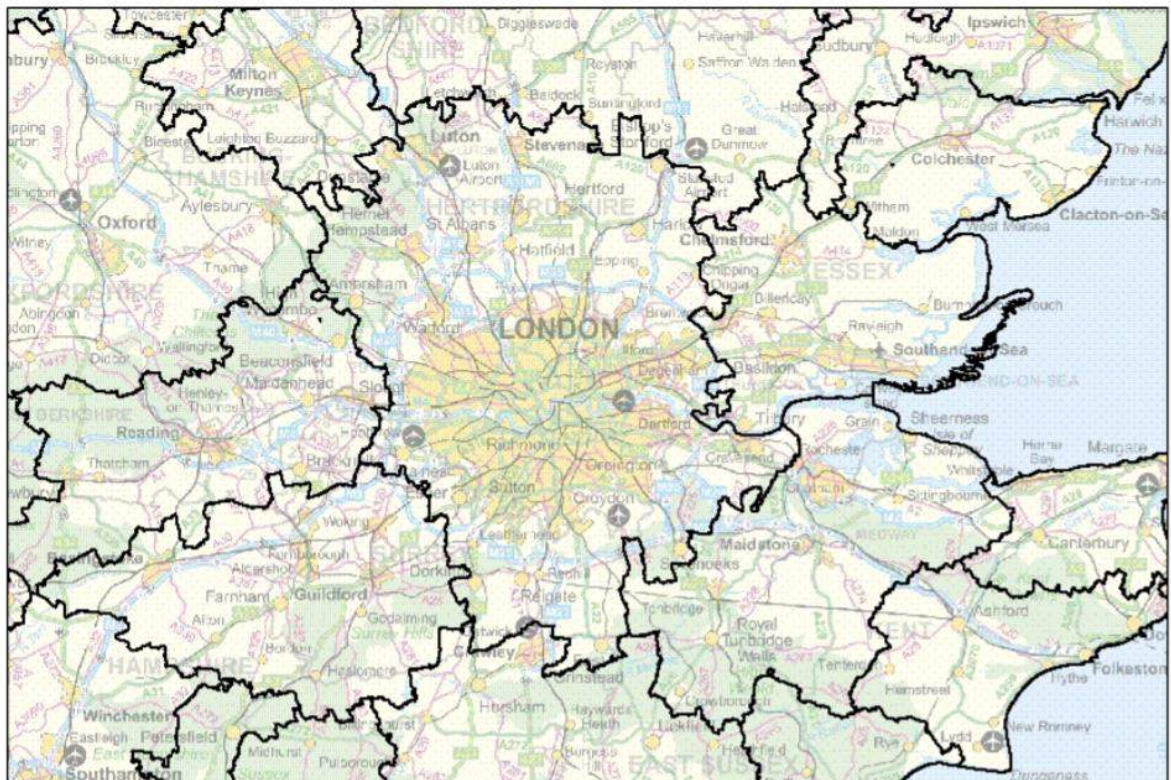
used the same approach as the previous report, considering migration flows only with authorities within Essex in Table 3.1, and ignoring London.

- 4.13 The report reaffirmed very strong cross-boundary commuting flows, Para 3.9 describing 55% of resident workers commuting out of the borough to work; and 52% of Brentwood jobs taken by in-commuters based on the latest 2011 Census data. This is not consistent with a self-contained HMA. No further analysis of migration flows, was undertaken.
- 4.14 Icenl consider that the further data presented in this report is limited and, as with the 2013 SHMA, does not justify the conclusions drawn that Brentwood forms a self-contained HMA. It is also notable that the consultants approach differs from that which they themselves advocated in a Technical Advice Note which was produced by PBA for the Planning Advisory Service.

The PAS Technical Advice Note

- 4.15 The SHMA consultants, Peter Brett Associates, prepared a Technical Advice Note on behalf of the Planning Advisory Service which sought to provide advice to local authorities on issues related to housing needs, and included a section (Section 5) on how to define the housing market area. We have appended this section of the advice note, as Appendix 3.

Figure 4.1 CURDS London HMA Geography



- 4.16 The PAS Guidance advised that national research undertaken by Newcastle University for Central Government to define housing market areas across England on a consistent basis should be used as a starting point for considering HMA geographies so as to avoid authorities defining HMA's independently each centred on their own area. This national research defines Brentwood Borough as within a London Housing Market Area (see Figure 4.1 above).
- 4.17 It set out that this should then be tested using local data and intelligence, using census data to consider migration self-containment and having regard to ONS Travel to Work Areas.
- 4.18 IcenI has analysed 2011 Census migration flow data, which considers moves over the 2010-11 period and allows analysis of self-containment. This is the latest available comprehensive data. Flows are shown in Table 4.1 below.

Table 4.1 Analysis of Migration Flows (2011 Census)

	Moved to Brentwood from ...	%	Moves from Brentwood to ..	%
Brentwood	2,727	41%	2,727	42%
London	1,578	24%	879	14%
Elsewhere in East of England of which	1,287	19%	1,822	28%
... Basildon	290	4%	405	6%
... Chelmsford	237	4%	409	6%
... Thurrock	121	2%	89	1%
Elsewhere in UK	586	9%	1,078	17%
From Abroad	533	8%	-	
Total	6,711	100%	6,506	100%

- 4.19 Our analysis shows that migration self-containment is 41-42% (depending on whether its measured using in- or out-flows) which is clearly substantively below the threshold of 'typically 70% set out in the Council's evidence.
- 4.20 The evidence shows a very strong relationship with London whereby 24% of those moving to the Borough came from London; and local relationships with a number of other authorities in Essex including Basildon and Thurrock. The evidence thus shows that London has a very significant impact on the local housing market.
- 4.21 IcenI has appended the 2011 Travel to Work Areas, as defined by ONS, in Appendix 2. This shows Brentwood Borough as falling principally within a Chelmsford TTWA, but with West Horndon falling within a Southend & Basildon Travel to Work Area. IcenI's analysis of where Brentwood residents work shows 45% work in the Borough, 35% work in London, 14% work in surrounding Essex Boroughs and 6% elsewhere. This shows that the strongest commuting relationship is with London and points to low self-containment within the Borough itself.

Table 4.2 Where Brentwood residents work (Source: 2011 Census)

	Where Brentwood residents work	% Residents
London	12,813	35%
In Borough	16,518	45%
Surrounding Essex Boroughs	5,012	14%
Total	36,621	100%

4.22 It is conspicuous that the consultancy which prepared this guidance on defining HMAs has not applied it in confirming the appropriate HMA for Brentwood. Key data sources identify Brentwood as forming part of a larger Housing Market Area and show links with London; with Chelmsford; and with South Essex authorities (particularly from areas in the south of the Borough).

Implications

4.23 Icenl accept that there are practical issues for the purposes of HMA preparation for defining housing market geographies around London, given that the GLA defines the London HMA as conterminous with London’s regional boundary. Whilst this may justify the preparation of evidential studies on a borough-basis, it does not justify in any way arguments that the HMA geography means it would not be appropriate to accommodate unmet housing needs from either London or other adjoining authorities in Essex.

Unmet Housing Needs

4.24 NPPF Para 11b states that:

“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

4.25 To be positively prepared, plans should:

“be informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and consistent with achieving sustainable development.”

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- 4.26 Box 5.1 of the Sustainability Appraisal states that it would be unreasonable for the plan to provide for housing provision below its own Local Housing Need, notwithstanding Green Belt coverage in the Borough. Box 5.2 states that it is reasonable to explore options for housing provision above Local Housing Need, noting a formal request from Basildon Borough Council to test the potential to meet its unmet housing need, unmet need from a number of other areas (as shown in SA Table 5.1) and the potential of higher housing provision to more fully provide for affordable housing needs.
- 4.27 SA Table 5.1 describes unmet housing needs as follows:
- Basildon: unmet need for up to 4,000 homes
 - Castle Point: unmet need figure potentially as high as 6,000 homes
 - Southend-on-Sea: a high risk of unmet need
 - Epping Forest: plan submitted with a shortfall of c. 1,100 against needs
 - London: an unmet need of 1,000 dpa against the 2017 London SHMA and delivery concerns.
- 4.28 Whilst the SA consultants treat these issues seriously and conclude that the Borough must test options for housing provision above its Local Housing Need, the Council's Duty to Cooperate Statement takes a very different approach making no reference to the need to actively work with adjoining authorities to test the potential for Brentwood to contribute to unmet housing needs of other areas; and instead arguing in effect that Brentwood is a self-contained HMA with constraints itself. The difference in approach is stark and highlights that the Borough Council's engagement through the Duty to Cooperate with its neighbours on issues of unmet housing need has not been effective.
- 4.29 Icenl consider that the option taken forward within the Plan, which does not make a contribution to addressing unmet needs, is not justified and is unsound. We consider that the plan should be amended to address this now.
- 4.30 Our representations set out below the evidence regarding quantified unmet housing needs from surrounding local authorities.

Unmet Housing Need from Basildon

- 4.31 Basildon Borough Council consulted on its Pre-Submission Local Plan between 1st Nov – 17th Dec 2018² and the Council intends to submit this for examination by the end of March 2019. The Plan will thus be examined against the 2019 NPPF.
- 4.32 The standard method using the latest data points to the need for 1,060 dpa.³ Applied to the remainder of the plan period (2018-34) this equates to 16,960 dwellings, to which we have added 2014-18 completions of 2,247 dwellings to give a plan period total of 19,207 dwellings.
- 4.33 Basildon's Local Plan makes provision for 15,465 dwellings over the 2014-34 plan period. Set against its Local Housing Need, there is therefore an unmet need of 3,742 dwellings over the period to 2034.
- 4.34 Brentwood's plan period runs to 2033. The equivalent unmet need over this period would therefore be 3,508 dwellings.
- 4.35 Basildon's October 2018 Duty to Cooperate Report⁴ sets out that it approached each authority in the South Essex Housing Market Area as defined (Southend-on-Sea, Rochford, Castle Point and Thurrock), with each responding that it was not in a position to contribute to Basildon's unmet housing need. Basildon also approach adjoining authorities outside the HMA including Brentwood.
- 4.36 Box 5.2 in the Sustainability Appraisal to Brentwood's Plan states that a formal request from Basildon BC was made to Brentwood to contribute to meeting its unmet need. The SA set out:

"Options involving providing for above LHN, in order to make some housing available to meet unmet needs arising from elsewhere, have been examined closely at past plan-making / SA stages ... Furthermore, the South Essex JSP SoCG aims for submission in early 2020, and hence the JSP now provides a forum for examining options for distributing unmet needs within South Essex.

However, Basildon Borough Council formally requested, through the January 2018 consultation, that options involving the Brentwood Local Plan providing unmet needs be explored.¹⁴ Basildon has historically sat within a housing market area (HMA) shared with Thurrock, Castle Point,

²[https://www.basildon.gov.uk/media/8646/Basildon-Council-Revised-Publication-Local-Plan-Oct-](https://www.basildon.gov.uk/media/8646/Basildon-Council-Revised-Publication-Local-Plan-Oct-2018/pdf/Basildon_Council_-_Revised_Publication_Local_Plan_-_Oct_2018.pdf?m=636765818012070000)

[2018/pdf/Basildon_Council_-_Revised_Publication_Local_Plan_-_Oct_2018.pdf?m=636765818012070000](https://www.basildon.gov.uk/media/8646/Basildon-Council-Revised-Publication-Local-Plan-Oct-2018/pdf/Basildon_Council_-_Revised_Publication_Local_Plan_-_Oct_2018.pdf?m=636765818012070000)

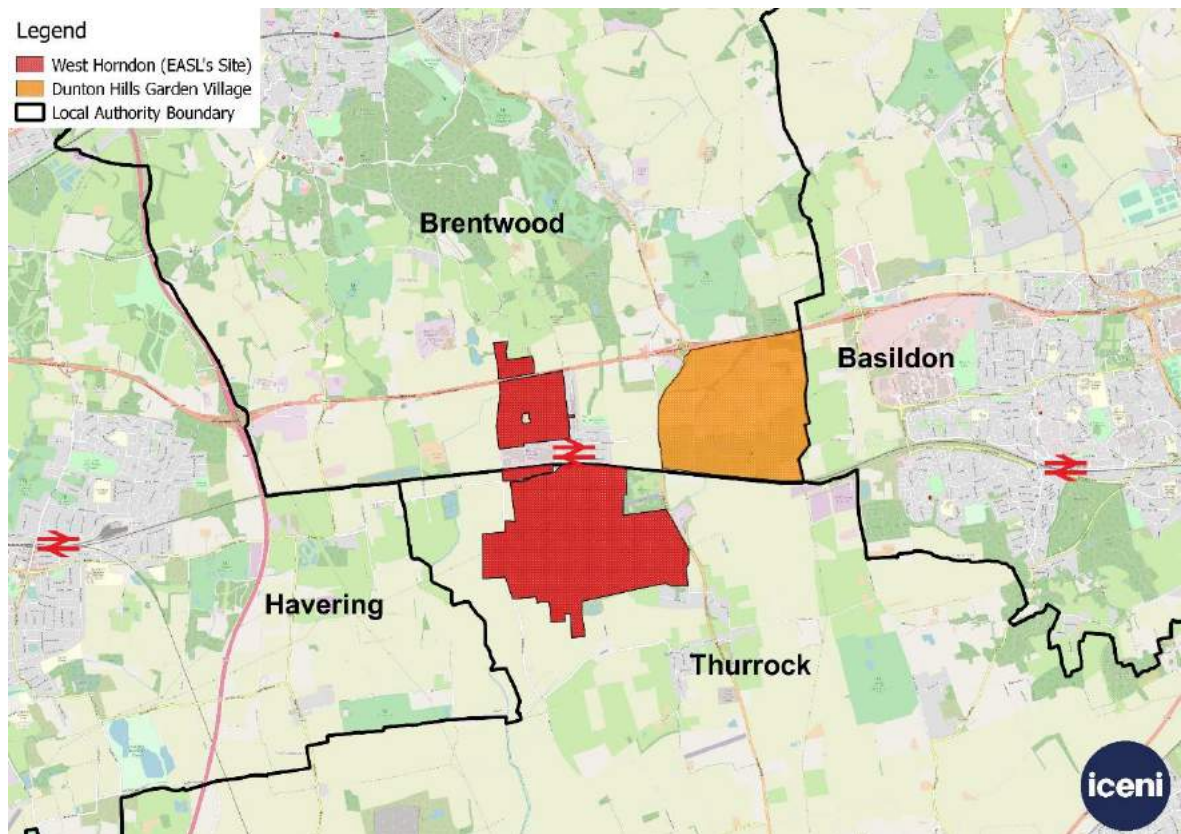
³ Using 2014 household projections and 2017 affordability ratio

⁴ https://www.basildon.gov.uk/media/8807/Basildon-Council-Revised-Publication-Local-Plan-Duty-to-Cooperate-Report-October-2018/pdf/Basildon_Council_-_Revised_Publication_Local_Plan_Duty_to_Cooperate_Report_-_October_2018.pdf?m=636803075420000000

Rochford and Southend (i.e. a South Essex HMA omitting Brentwood), and a recent report prepared by Basildon officers explains a protocol for dealing with unmet need that involves focusing on the authorities within its HMA; however, the Basildon request must nonetheless be given careful consideration. It is clearly the case that Basildon does link closely to Brentwood, most notably along the A127 corridor.”

- 4.37 Icenl note that a) there was thus a formal request that Brentwood contribute to addressing Basildon’s unmet housing need; b) that the SA consultants considered that there was clearly a close relationship between the authorities and that this was therefore a reasonable request; and c) the approach was consistent with the mechanism agreed by Essex authorities on addressing unmet housing needs.
- 4.38 The Essex Planning Officers Association agreed a *Mechanism for the Consideration of Unmet Housing Need* in September 2017. We have included this at Appendix 4 to our representations. In Paragraph 3.1 it is clear that where it is not possible to address an unmet need within an HMA, a request to an adjoining HMA should be considered. It is clear from this whilst authorities within a common HMA are the first port of call for addressing unmet needs, the HMA geography itself is not a sound reason for not contributing to addressing unmet needs from an adjoining Essex authority.
- 4.39 West Horndon and Dunton Hills in the south of Brentwood Borough sit close to Basildon, with a regular rail service linking West Horndon to Basildon. They fall within a common Travel to Work Area. Icenl consider that it is entirely reasonable that growth in the south of Brentwood Borough contributes to Basildon’s unmet housing need. The Pre-Submission Plan is not sound as it does not make a contribution to addressing this clear unmet housing need from Basildon.
- 4.40 Given that the Dunton Hills Garden Village sits very close spatially to the Basildon Borough boundary, and indeed to the town of Basildon, it is particularly unclear as to why this proposed strategic allocation for 2,700 homes is not addressing or contributing to Basildon’s unmet need.

Figure 4.2: West Horndon's Location



Unmet Housing Need from Havering

- 4.41 The London Borough of Havering submitted its draft Local Plan for examination in March 2018. Brentwood Council has signed a SOCG with LB Havering which recognises that Havering has an unmet housing need.⁵ We have included this at Appendix 5.
- 4.42 Havering's objectively-assessed housing need (OAN) has been assessed as 30,052 dwellings over the 2011-33 period (1366 dpa).⁶ Delivery over the 2011-16 period totalled 4,116 dwellings. The submitted Local Plan makes provision for at least 17,550 homes over the 2016-31 plan period. It will thus deliver 21,666 dwellings over the 2011-31 period, compared to a need of 27,320; indicating a substantial unmet need for 5,654 dwellings to 2031.

⁵

https://www.havering.gov.uk/download/downloads/id/2747/lbhlp43_statement_of_common_ground_with_adjoining_authorities.pdf

⁶ Havering Housing Position Statement – Jan 2019, Para 4.7

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- 4.43 Brentwood's September 2017 representations to Havering's Plan identify that housing provision is a cross-boundary issue between the authorities. It states that:

"Brentwood Borough note that the Local Plan Submission Draft does not propose to have other boroughs to meet any of the Havering unmet housing or Gypsy and Traveller need. It is also noted that the LB of Havering has sought to identify all sources of potential housing supply and identify sustainable development sites in order to close the gap between the housing target set in the London Plan and its objectively assessed need requirement with two Strategic Development Areas in Romford and in Rainham and Beam Park (both with Housing Zone status).

The LB Havering approach to the allocation of new homes, to Gypsy and Traveller pitches does not require that Brentwood Borough to provide any additional allocations which would add to the Brentwood objectively assessed need. Therefore, Brentwood Borough, whilst acknowledging that LB Havering is not able to meet its full identified need for housing and pitches, do not object to the LB Havering Draft Local Plan 2017. However, should this request be made in the future it must be acknowledged that as a borough entirely within the London Metropolitan Green Belt, Brentwood Borough is unable to release Green Belt to meet any of this need for other Planning Authorities."

- 4.44 Brentwood's representations indicate an in-principle unwillingness to contribute to meeting unmet needs from adjoining authorities. This is contrary to the NPPF and indicates that whilst there may have been discussions with adjoining authorities, these have not been effective.
- 4.45 There has not been a formal request from Havering to Brentwood (or any other authority) to contribute to meeting Havering's unmet housing need. It appears therefore that this unmet need is simply being "swept under the carpet." This is inappropriate. Icen consider that it would be entirely reasonable for Brentwood to contribute to meeting the unmet housing need arising from Havering which has clearly been identified and recognised for some time.

London's Housing Needs

- 4.46 The examination of the London Plan is ongoing at the time of writing, but the evidence points to a significant unmet housing need arising from London – particularly in the short-to-medium term.
- 4.47 The 2017 London SHMA has assessed London's housing needs (using the 2012 NPPF approach) as 66,000 homes per year (2016-41). This is referenced in Table 5.1 in the Council's SA. The draft London Plan proposes provision of 65,000 homes a year.

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- 4.48 However the Secretary of State for Housing, Communities and Local Government wrote to the Mayor of London on 27th July 2018⁷ indicating that he considered that London's housing needs had been under-estimated and the GLA 2017 SHMA methodology did not reflect the full extent of housing need in London to tackle affordability problems. We have included this letter at Appendix 6.
- 4.49 The Secretary of State's written representation to the London Plan Examination⁸ have confirmed this position and set out that once the London Plan has been finalised and published, if the housing requirement set out is significantly lower than that derived from the standard methodology in the 2018 NPPF, then the Mayor would be required to work towards an early review of the London Plan to address this. The standard methodology generates a need for 72,800 homes per year across London.
- 4.50 The evidence therefore essentially points to an unmet need for around 7,800 homes per annum across London, which would equate to a total unmet need for 117,000 homes over Brentwood's plan period to 2033.⁹
- 4.51 The London Plan Review will consider whether there is further capacity which can be released in London. However, there is also a deliverability issue, and Iceni notes that London has failed to achieve the lower housing target of 42,000 homes per year in the current London Plan in recent years.

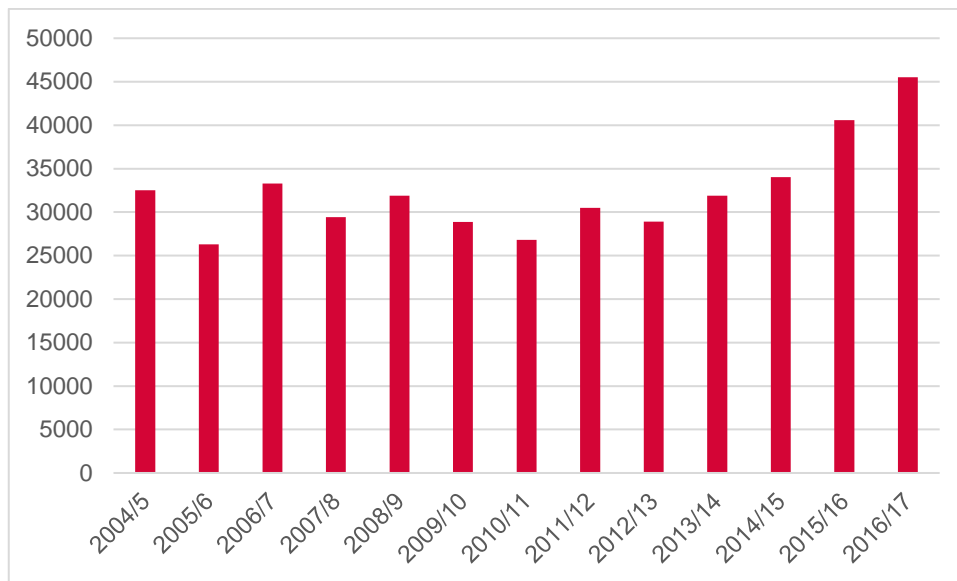
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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730327/20180727_Letter_from_Secretary_of_State_to_the_Mayor_of_London_on_the_London_Plan_and_the_NPPF.pdf

⁸ https://www.london.gov.uk/sites/default/files/m17_mhclg_2631.pdf

⁹ Calculated based on 15 year period, 2018-33

Figure 4.2: Housing Delivery in London, 2004-17



Source: London Plan Annual Monitoring Report

- 4.52 There has been an upward trajectory in housing delivery in London in recent years, but the delivery of the 66,000 homes pa target in the emerging London Plan is reliant on a very substantial increase in delivery from small sites which make up 38% of the total supply identified in the 2017 London SHLAA.
- 4.53 In the short-to-medium term, it is clear that London will fall well short of meeting its housing needs. This can be expected to result in increased out-migration to areas outside of London but with strong transport links to it. Brentwood is one such area with existing regular rail services to London, and where a major increase in capacity is expected to arise with the opening of Crossrail (the Elizabeth Line) in 2019.
- 4.54 In the context of a clear unmet housing need from an adjoining area, Icen consider that Brentwood should made provision to address the clear short-to-medium term shortfall in housing delivery in London.

5. BRENTWOOD'S LOCAL HOUSING NEED & SUPPLY

Housing Need

The Standard Method Starting Point and the Housing Requirement in the Plan

5.1 Paragraph 60 in the NPPF states that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

5.2 Planning Practice Guidance has been amended in February 2019 to make clear that the baseline for assessing need should be the 2014-based Household Projections. The latest data at the current time gives a minimum Local Housing Need for Brentwood Borough of 452 dwellings per annum. The calculation of this is set out in Table 2.1. Over the 2016-33 plan period, this equates to 7,684 dwellings.

Table 5.1 Brentwood's Local Housing Need

	2014-based Household Projections
Setting the Baseline:	
Household Growth pa over next 10 years, 2019-29	323
Affordability Adjustment:	
Median workplace-based affordability ratio, 2017	11.23
Adjustment factor	45%
Step 2 housing need figure	469
Cap:	
Cap @ 40% above Step 2 LHN	452
Local Housing Need (dpa):	452

5.3 New affordability ratio data is however due to be published on 28th March 2019. This will be before the submission of the Plan, and the Council should review the effects of this on housing need.

5.4 Paragraphs 4.12 – 4.15 in the Plan require amendment to reflect the latest evidence on housing need. It is now incorrect to state that the standard method generates a need for 350 dpa; or that the plan is providing allocations above its minimum local housing need.

5.5 Policy SP02 in the Pre-Submission Plan makes provision for 7,752 new dwellings over the 17 year plan period 2016-33. This is equivalent to 456 dwellings per annum. It thus marginally exceeds the standard method figures by less than 1%. Effectively it aligns with the minimum need figure.

5.6 The Pre-Submission Plan also confuses issues related to the housing requirement with the housing supply buffer. The housing requirement (currently 7,752 dwellings as set out in Policy SP02) should take account of the Borough's own housing need, and any unmet needs from other areas in line with Para 60 in the NPPF. It is then necessary to provide supply-side flexibility over and above this in order to meet the requirement.

5.7 Icenl consider that to accord with the Framework, the housing requirement figure in Policy SP02 should be identified as a minimum figure.

The 'Uncapped' Housing Need

5.8 The minimum local housing need figure is however influenced by a cap. The uncapped housing need is for 469 dpa (as shown in Table 2.1 above). Over the 17 year plan period this would equate to a need for 7,973 dwellings.

5.9 Para 2a-007-20190220 in the PPG states that:

"The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible.

Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered. This may help prevent authorities from having to undertake an early review of the relevant policies."

5.10 The actual (or full) level of housing need shown by the standard method is therefore 7,973 dwellings. This is 220 dwellings above the housing requirement in the Plan. The PPG is clear that consideration should be given to whether this level of housing need can realistically be delivered.

5.11 Land at West Horndon is available, suitable and deliverable and can contribute to meeting this shortfall. The land at West Horndon does not require any significant infrastructure and therefore can come forward in early part of the Plan period to assist the Council in meeting the short to medium term housing needs.

The Effects of Crossrail's Opening

5.12 The NPPF Glossary defines Local Housing Need as *"the number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in*

the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).” Paragraph 60 is clear that the standard method should be used to define the minimum local housing need, and IcenI supports this.

- 5.13 However Planning Practice Guidance clearly states in Para 2a-01020190220 that there will be circumstances where it is appropriate to consider whether actual need is higher than the standard method indicates. The Paragraph states:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

- 5.14 IcenI’s representations have considered issues related to unmet housing needs in Section 4. However IcenI consider that the opening of the Elizabeth Line (Crossrail) in 2019, in providing

significantly enhanced rail capacity and improved accessibility from key settlements in the Borough can be expected to increase housing need above that indicated by the standard method.

- 5.15 The 2018 Economic Futures Report, which forms part of the Plan's evidence base, states in Para 2.48 that *"Crossrail will improve Brentwood's already good commuter [rail] service to London; improving services to the City of London, West End and Isle of Dogs which are already current popular out-commuting destinations for Brentwood residents (see Figure 2.3). The introduction of Crossrail could also lead to an increase in the number of people commuting from London to Brentwood."* It is surprising on this basis that there has been no consideration of the effect of Crossrail on housing demand as part of the evidence base. It has not been assessed as part of the SHMA.
- 5.16 The Council's Transport Assessment (prepared by Peter Brett Associates) describes the impact which Crossrail will have on increasing accessibility to major employment destinations and increasing capacity on the rail network, Para 1.2.7 stating:

"The Elizabeth Line is a major infrastructure project, which will provide rail services between Reading in the west to Shenfield in the East and which will provide services across London. The project is expected to be completed by late 2018 and will provide very frequent services from both Shenfield and Brentwood Stations, to and through London. At peak times the current planned timetable includes 12 services per hour from both stations to London, on top of the existing services that serve these two stations. This will provide a very large increase in capacity for rail travel, as well as the improved service frequencies. In addition, the Elizabeth Line will provide improved access to parts of London and beyond, including Heathrow, which were not previously served directly."

- 5.17 Crossrail will increase capacity especially at Brentwood Station from 12 trains in peak hours to 24 trains. There is also a slight improvement in travel times to key London destinations. Shenfield Station will benefit from an increased frequency of train services to London and the convenience of services which enable passengers to travel to key London destinations without changing train.
- 5.18 The "very large increase" in rail capacity, improved service frequencies and reduced journey times to a range of destinations in London and across the wider region can be expected to contribute to additional housing needs, and support enhanced in-migration to the Borough. If the Plan does not address this, affordability will deteriorate further.
- 5.19 Figure 5.1 below shows an upward trend in entries and exits at the key Crossrail Stations in the borough. It shows a clear upward trajectory in rail commuters.

Figure 5.1: Entries and Exits at key Crossrail Stations



5.20 Para 1.2.9 in the Transport Assessment indicates that whilst the impact of Crossrail will need to be monitored, early demand modelling indicated that passenger growth at Brentwood and Shenfield was likely to be in the order of 10%. Icen consider that this will likely principally be through the effect which the new rail infrastructure has on increasing Brentwood’s residential attractiveness and leading to increased in-migration to the Borough (rather than modal shift).

5.21 Taking the 2018 baseline of 6.9 million entries and exits at Brentwood and Shenfield, 10% growth would represent an additional 686,000 entries/exits per year. We have assumed that 80% of this relates to commuter travel and that there are on average there are 210 commuting days per year. This implies around 1,300 additional commuters can be expected. Assuming an average of 1.3 commuters per home, this would imply a need for an additional 1,005 dwellings over the plan period. Our calculations are set out in Table 5.2.

5.22 Icen consider that an additional 1,000 dwellings should be added to the Local Housing Need over the plan period to take account of the effects of the enhanced accessibility provided by Crossrail on the housing market.

Table 5.2 Icen Estimate of Impact of Crossrail Opening on Housing Need

	Brentwood & Shenfield Stations
Baseline Entries & Exits to Stations, 2018	6864558
Assumed 10% growth due to Crossrail opening	686456
Commuter travel @ 80%	549165
Additional daily trips (@210 commuting days pa)	1308

Average commuters per home	1.3
Implied additional households	1006

Housing Supply

5.23 NPPF Paragraph 73 states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. It states that local planning authorities should identify and update annually a supply of specific deliverable sites to provide a minimum of five years' worth of housing against the housing requirement. Para 67 states that planning policies should identify a supply of specific deliverable sites for years 1-5 of the plan period (together with an appropriate buffer); and specific developable sites or broad locations for growth for years 6-10 and where possible for years 11-15 of the plan.

5.24 The housing supply position will be influenced by a) what the housing requirement over the plan period is (which our representations have addressed in previous sections); b) the justification, appropriateness and form of any stepped requirement; and c) the land supply position and in particular the supply of specific deliverable sites. We address issues b) and c) in this section.

Justification for a Stepped Housing Requirement

5.25 Policy SP02 in the Pre-Submission Plan proposes a stepped housing requirement, with an annual requirement for 310 dwellings per year to 2022/23 followed by 584 dwellings per year from 2023/24 to 2032/33.

5.26 There are two separate soundness issues which arise from this: a) whether the principle of a stepped housing trajectory is justified; and b) whether the proposed steps and the figures set out within them are justified. We consider each below.

The Principle of the Stepped Trajectory

5.27 Icen consider that the starting point for examination of the Plan should be that a straight rather than stepped trajectory should be used, as the effect of a stepped trajectory is to defer the meeting of housing need to later years in the Plan, the effect of which will be to allow a significant historic under-delivery of housing to persist, with the Borough continuing to under-supply against its housing requirement until at least 2022/3. This will be to see affordability in the Borough deteriorate further; and constrain the delivery of affordable housing to meet urgent identified needs.

5.28 The evidence indicates that:

- This is not a plan which is overly-dependent on the delivery of large strategic sites. The strategic allocation at Dunton Hills accommodates a modest 35% of the supply over the plan period;

-
- There is not an issue of market capacity which would deliver high levels of housing provision in the short-term. To meet the housing requirement over the remainder of the plan period (2018-34) would require housing stock growth of 1.4% per annum. This is a level which has been exceeded historically in a range of authorities with similar or weaker market characteristics;
 - There are additional deliverable exception sites which could be allocated within the plan which would contribute to delivery in the five year period, including Land at West of Thorndon Avenue, West Horndon.
 - The effect of a standard annualised trajectory would be to boost housing delivery in the short-term with beneficial effects on the delivery of affordable housing, workforce growth and market housing affordability; particularly in view of the effect which Crossrail's opening in 2019 could have on housing need.

5.29 The examination of the Plan should therefore consider whether additional housing supply which could be brought forward in the short-term could be increased in order to meet the annualised plan period requirement in the five-year period.

Justification for the Steps

5.30 Whilst we do not consider that the principle of a stepped trajectory is justified, if this is accepted we consider that it should be tested whether a higher annual rate of housing delivery over the five year period to 2023 could be achieved; such as testing a requirement figure of 350 dpa and 400 dpa over this period.

5.31 Icenl note that the current requirement for 310 dpa would fall below even the projected level of household growth.

Buffer

5.32 Footnote 39 in the Framework is clear that the appropriate buffer to apply to the base housing requirement in calculating five year land supply is determined by the Housing Delivery Test. The published figures indicate that Brentwood delivered 51% of the required housing delivery. As this falls below 85%, it is clear that there has been significant under-delivery of housing and that a 20% buffer is applicable.

5.33 Icenl has set out below the implications of different scenarios for the housing requirement and whether or not a stepped requirement is acceptable, on the requirement figure for the purposes of calculating the five year land supply.

Table 5.3 Different Scenarios for Five Year Requirement for 5 Year Land Supply Purposes

	Base requirement (dpa)	Shortfall 2016-18	Sub-Total	20% Buffer	Total Requirement	Requirement per Annum
Annualised Plan Requirement	456	549	2829	566	3395	679
Stepped Requirement	310	257	1807	361	2168	434
Uncapped Requirement	469	575	2920	584	3504	701
Crossrail-adjusted Requirement	528	693	3333	667	4000	800

Deliverable Housing Supply

5.34 The 2019 NPPF Glossary defines “deliverable” sites as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.” (emphasis added)

5.35 Para 3-036-20180913 in Planning Practice Guidance defines the form of evidence required to support the inclusion of sites for major sites without detailed / reserved matters consent, including progress with site assessment work and towards the submission of applications; information on viability, ownership constraints and infrastructure provision. It sets out that this for instance might include a Statement of Common Ground with promoters confirming delivery intentions and the anticipated start and build-out rate. The onus is on the Council to provide such information.

5.36 The information available as part of the Regulation 19 consultation falls substantially short of that required by the Planning Practice Guidance to demonstrate that a deliverable supply exists. The Council’s October 2018 Five Year Land Supply Statement includes a table of sites which addresses site capacity, planning status and assumed completions but no commentary on issues related to

ownership, development viability, infrastructure or an agreed delivery timescale with site promoters. Icení reserve the right to comment further on such information if it is subsequently made available.

5.37 Based on the limited information currently provided, we would make the following comments regarding the deliverable supply:

- Brescia House and 5-7 Eastfield Road, Brentwood – this consent appears to have lapsed. It should be removed from the deliverable supply (impact -11 dwellings).
- Prior Approvals – a range of these schemes are not controlled by a housebuilder/developer. Whilst the scheme shown have prior approval, there is a history of further applications being progressed to increase the yield of sites such as through the upwards extension of buildings or delivery of housing on associated car parking. A number of the schemes continue to be marketed as office provision. The Council assumes all prior approvals will be delivered in the five year period which is unrealistic. A higher allowance of 30% for non-implementation and slippage should therefore be applied to this source of supply. With 417 dwellings identified from this source in the five year period, a reduction of 83 dwellings should be made.
- West Horndon Industrial Estates – Hermes, who own the site, have indicated that a phased approach to development is envisaged, which is realistic given the need to relocate businesses. The 2018 SHLAA did not include either site as contributing to delivery in the first five years and the Council's inclusion of both sites in the five-year period is not justified. There are potential contamination issues associated with previous manufacturing/ chemical uses which could affect both viability and delivery timings. No planning applications have been submitted. Icení consider that at most 50 dwellings will be delivered in the five-year period. (impact -80 dwellings).
- Car Park Sites – there are a number of Council car park sites included within the deliverable supply – Westbury Road and Chatham Way/Crown Street. The Council has yet to agree a disposal programme, at the current time has yet to appoint a development partner and no work on schemes for these sites appears to have progressed. These sites will clearly not deliver dwellings in 2020/1 and we envisage delivery would slip at least 2 years from that shown. (impact -57 dwellings).
- Waste Water Treatment Capacity – Thames Water's previous representations have raised concerns regarding the capacity of Waste Water Treatment Works which affects development at Brentwood and Pilgrims Hatch. This could significantly impinge on delivery timescales for allocated sites in these areas, and this needs to be further considered and reflected in expected delivery timescales.
- Dunton Hills Garden Village – There is a significant volume of work expected to be undertaken as part of the preparation of a masterplan. Policy R01 requires preparation of a locally-led masterplan and design guide which would need to be prepared in advance of submission of an

outline application. No detailed information has been provided by either the promoter or the developer to demonstrate that the development would be viable (including its ability to deliver key supporting infrastructure), nor to establish and justify the phasing of development. There are substantive access and drainage issues which require resolution including provision of a new rising main to serve the development.

A recent example of a large strategic site brought forward by the promoters CEG is at Lighthorne Heath near Stratford-upon-Avon, Warwickshire. CEG submitted an outline planning application for up to 2000 homes in March 2015. The Council adopted both its Core Strategy and a site-specific SPD/ Masterplan in July 2016. The SPD envisaged first completions in 2017/18. The outline planning application was granted consent in December 2017. The first Reserved Matters application (for 140 dwellings) was submitted in November 2018, and first completions are now envisaged in 2020/1. From submission of an outline application to first completions in this scheme is therefore over 5 years.

In the case of Dunton Hills, no work on the locally-led masterplan and design guidance with the community has been progressed; and no outline planning application has been received. The evidence does not indicate that Dunton Hills Garden Village will contribute to delivery in the five year period. 100 dwellings should therefore be removed from the five year land supply.

- 5.38 Taking the total deliverable supply in the Council's October 2018 Statement and making the adjustments above, we consider that the deliverable supply over the 2018-23 period totals 1,306 dwellings.

Table 5.4 Brentwood Deliverable Supply

	Supply	Reductions	Non-Implementation Discount	Total Supply
Sites with Resolution to Grant	223	0	10%	201
Extant Permissions on Large Sites	103	11	10%	83
Extant Planning Permissions on Small Sites	230	0	10%	207
Prior Approval (Residential)	417	0	30%	292
Allocations	819	237	10%	524
Total	1792	248		1306

- 5.39 The deliverable supply of 1,306 dwellings shown in Table 5.4 can be compared with the housing requirement scenarios shown in Table 5.3 to assess the five year land supply position. This is shown in Table 5.5.

5.40 Icen considers that the Council can demonstrate at best a deliverable supply of 3.0 years using the housing requirement and stepped approach in the Plan. A more realistic assessment is that that the supply position is less than 2 years.

Table 5.5 Icen Assessment of Land Supply Position, Brentwood Borough 2018-23

	Deliverable Supply	Requirement	Land Supply (Years')	Minimum Shortfall (dwellings)
Annualised Plan Requirement	1,306	679	1.9	2,089
Stepped Requirement	1,306	434	3.0	862
Uncapped Requirement	1,306	701	1.9	2,198
Crossrail-adjusted Requirement	1,306	800	1.6	2,694

5.41 Land at West Horndon is a greenfield, unconstrained site. It has an access in place and is sustainably located close to West Horndon Rail Station. It has no significant infrastructure requirements and has been identified by the Council in the SHLAA as a deliverable site which could contribute to delivery in the first five years. The merits of allocating land at West Horndon are further detailed in the subsequent sections of these representations.

6. BRENTWOOD'S EMPLOYMENT LAND NEEDS

6.1 Icen consider that the Brentwood Borough Council has under-estimated the need for B-class employment land in the Borough, and that its employment land supply is insufficiently flexible.

Need for Employment Land

6.2 The following factors are relevant in interpreting the quantitative assessment of needs set out in *Brentwood Economic Futures 2013-33 Report*.

- The provision of employment land in the Borough has been historically constrained. This is clear from the 2005 Replacement Local Plan which is clear in Paras 4.4 and 4.15 that potential for employment development has been constrained by Green Belt. This will have constrained the growth of the Borough's economy influencing both past development rates (Scenario D) and employment trends which feed into 'trend-based' projections (Scenarios A and B).
- The influence of land supply constraints in London and movement of businesses from areas outside of but accessible to London (as referenced in the Plan in Para 7.26) has not been addressed in considering quantitative need.
- The housing growth scenario considered in the Economic Futures report was based on delivery of 380 dwellings per annum, with Para 3.11 in the Study clear that higher housing provision (as the plan proposes) would affect the results of this scenario.
- The assumptions on converting floorspace to land requirements assume essentially 50% of office floorspace requirements are accommodated at town centre densities, whereas no new supply is proposed in town centre locations. This assumption is unrealistic. This alone increases the requirement by up to 7.8 ha.

6.3 In addition, the Economic Futures Report sets out that qualitative factors need to be considered including the locational needs of different occupiers/ sectors, the quality of premises and gaps in supply. There is no evidence that these issues have been adequately considered.

6.4 The evidence base has for instance not considered the established need which exists for data centres, which require accessible locations with high quality broadband connectivity and sufficient power capacity. Land at West Horndon is an attractive location for these uses by virtue of the quality of broadband and power infrastructure and its proximity to the major financial centres in City of London and Isle of Dogs.

6.5 Paragraph 82 in the NPPF states that:

*Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and **data-driven**, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations” (our emphasis)*

6.6 The Plan and its evidence have not taken account the locational requirements of data centres and made provision for this.

Employment Land Supply

6.7 In addition to under-estimating the need for employment land, the Borough has insufficient flexibility in supply.

6.8 Brentwood Enterprise Park is the largest proposed employment allocation. It is expected to deliver 25.85 ha of developable land adjoining M25 Junction 29 and constitutes 55% of the proposed supply through new employment land allocations.

6.9 The delivery of the Lower Thames Crossing is likely to however preclude or delay the delivery of this site. The Council’s own representations to Highways England state:

“The current Lower Thames Crossing proposals compromise the existing access arrangements to Brentwood Enterprise Park. This risks the delivery of the largest employment allocation in Brentwood Borough, and one of the two largest proposed in Essex.

The current Lower Thames Crossing proposals also set the need for temporary access through the centre of Brentwood Enterprise Park to service National Grid infrastructure/pylons to the south of the site.”

6.10 This serves to highlight a lack of flexibility in the employment strategy within the Local Plan. Whilst a ‘safety margin’ has been included to make some provision for delayed site delivery within the evidence base, this is clearly insufficient.

6.11 A delay or non-delivery of the Brentwood Enterprise site has significant implications in respect of:

- Providing employment opportunities in the southern parts of the borough;
- Delivery of high-quality employment space in the Borough;

-
- Capturing demand from businesses relocating out of London (see Para 7.26 in the Plan).

6.12 This is contrary to Paragraph 80 and 81 in the Framework.

6.13 Icenl consider that additional employment sites for employment development should be identified and allocated. Land at Thorndon Avenue, West Horndon could support new employment provision including a data centre and other B-class uses incorporated as part of the overall mixed-use development, meeting an identified need; supporting flexibility of supply and also contributing towards local employment generation and supply for local businesses, mitigating the impact of the loss of the West Horndon Industrial Estate for new residential development.

7. BRENTWOOD LOCAL PLAN SPATIAL STRATEGY

Transit Orientated Growth

7.1 The foundations of the Local Plan are based on ‘transit-orientated growth’ which acts as the golden thread in the Council’s spatial strategy. Para 3.11 of the Local Plan details that Brentwood has two key transit corridors running through the borough:

- the ‘Central Brentwood Growth Corridor’, with the A12, the Great Eastern Main Line to London Liverpool Street Station, and the Elizabeth Line;
- and the ‘Southern Brentwood Growth Corridor’, with the A127 and the London, Tilbury and Southend Railway to London Fenchurch Street Station.

7.2 The Plan further states in relation to these corridors that:

“These form key connectivity axes. Focusing growth along these axes will ensure that future development is sustainable, maximising the benefits of transport infrastructure. While some investment to improve the transport network will be inevitable, this growth strategy ensures economies of scale are reached, with the critical mass of development making it more viable for such investment to occur.”

7.3 West Horndon, along with DHGV, lies within the Southern Brentwood Growth Corridor. West Horndon is Category 2 Settlement which is defined in the Local Plan as:

“Larger villages in a rural setting, with high levels of accessibility and public transport provision, including rail services. They provide a range of services and facilities to the immediate residential areas and nearby settlements. Appropriate urban extension and brownfield redevelopment opportunities will be encouraged to meet local needs. The level of development in these settlements should consider their infrastructure constraints and setting.”

7.4 Furthermore, the subject site at West Horndon is within the ‘key gateway’ depicted in Figure 3.2 Growth Areas of the Local Plan. Figure 3.2 Growth Areas demonstrates that the Council’s strategy incorporates the subject site to the north of West Horndon. The fact that this site is not allocated for growth, to make a positive contribution towards the Council’s housing needs, is at odds with the spatial strategy detailed in the Local Plan.

7.5 In view of the above extracts from the Local Plan and the basis of the spatial strategy which is to focus growth on the Southern Brentwood Growth Corridor to maximise the benefits of the railway line – the development of modest urban extension at West Horndon on a self-contained parcel is

wholly in accordance with the settlement strategy. There is nothing in the Local Plan which demonstrates the reasoning why this site is not allocated.

Green Belt

- 7.6 The Local Plan details the need to release land from the Green Belt and para 8.82 details the process followed in reviewing the Green Belt boundaries, however the Plan fails to reference the Framework para “*Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.”*”
- 7.7 In the Southern Brentwood Growth Corridor, the Local Plan partly complies with the Framework in so far as the brownfield land at West Horndon is allocated for housing. However, the Plan fails to accommodate growth on the Green Belt land, under the control of EASL, which is best served by public transport, first and foremost, before allocating growth in the areas further removed from public transport.
- 7.8 Para 8.84 of the Local Plan states that the borough’s growth strategy has carefully selected sites and have prioritised: brownfield and previously developed land, locations which are sustainable and do not result in the detrimental impact on important environmental designations, areas where the purposes of the Green Belt can still be demonstrated as being intact thereby maintaining the essential characteristics of ‘openness’. The subject lands at West Horndon adhere to and in fact deliver these objectives, therefore it remains unclear why this site is not allocated.

Sequential Land Test

- 7.9 Policy SO1: Manage Growth Sustainably in the Local Plan seeks to direct development to the most sustainable locations. This is supplemented by the application of a sequential land use test which the Council states has been applied. The Plan states that the development proposals in the borough will adhere to the following principles:
- a) Urban areas;
 - b) Brownfield Green Belt;
 - c) Strategic sites – Use opportunities created by larger housing development to deliver new homes and supporting services and infrastructure;
 - d) Urban extensions – Deliver new homes in areas close to existing transport infrastructure and local facilities; and
 - e) Windfall.
- 7.10 The Plan goes on to state at para 4.22 that the spatial strategy informs the allocation of sites for development. This considers each location in terms of a sequential land use test, in line with guidance

and best practice. The Local Plan does not specify what guidance and best practice it is following in this instance; however, it is difficult to fathom how a strategic site - removed from existing infrastructure - is more sequentially preferable to an urban extension where there is existing infrastructure available including a rail station. The Local Plan is suggesting that it is preferable to build an entirely new settlement before expanding and enhancing an existing settlement, which does not appear to accord with the standard protocol for a sequential test which is generally - town centres; edge of centre followed by out of centre.

Transport Infrastructure

- 7.11 The Local Plan reaffirms that sustainable transport is a key component of sustainable development and details that 'encouraging sustainable travel patterns is of key importance'. The Plan is explicit that given Brentwood benefits from rail connections, this should be utilised going forward. Policy BE11: Strategic Transport Infrastructure states that the Local Plan will be 'maximising the value of railway connectivity'.
- 7.12 The Plan expands on this point stating that the proximity of new housing developments close to railway stations can provide the opportunity to improve cycling and walking infrastructure for shorter distance trips, to access rail services. The Council support high quality sustainable new development that maximises opportunities for travel by sustainable modes.
- 7.13 The Plan details that for the South Brentwood Growth Corridor, there is a recognition that provision of sustainable transport in this area is poor. To mitigate the impact of future development on the highway network in the South, it states that the Council will work proactively with developers, key stakeholders and service providers to implement new area-specific sustainable transport measures, which would seek to mitigate transport impacts of sites on the highway infrastructure, improve bus links across the area and improve capacity of West Horndon station.
- 7.14 In regard to a new integrated transport hub at West Horndon, the Local Plan states that:
- 'Policies for the delivery of Dunton Hills Garden Village will set the precedent for new accessible connections to be made with West Horndon railway station nearby, providing a new transport interchange, among other aspirations.'*
- 7.15 Given the importance of ensuring the new transport interchange at West Horndon is delivered it is not clear how this is achievable as the Local Plan is currently prepared. The redevelopment of the Industrial Estate at West Horndon is anticipated to take a minimum of 10 years according to the Council's housing trajectory.

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- 7.16 The DtC Position Statement fails to detail the extent of, if any, agreements that are in place with c2c to deliver the necessary enhancements to West Horndon station. Furthermore, all of the traffic accessing the West Horndon station from Dunton Hills Garden Village will be via Station Road and through West Horndon village. This does not appear to have been assessed in the Transport Assessment, which accompanies the Local Plan.
- 7.17 EASL has an interest in land to the south of West Horndon, which lies within Thurrock Council boundary. A Delivery Statement prepared by EASL in response to the Thurrock Issues and Options Consultation (December 2018) is attached at Appendix 1. Thurrock Council has identified the land to the south of West Horndon as having the potential to accommodate a new settlement (10,000 homes) or a small urban extension (1,500 homes) as part of the emerging Thurrock Local Plan. Both of these options have the potential to deliver a link road to the A128 which will enable the creation of a loop route to connect DHGV to the station without the need for all traffic to come through the existing village (Appendix 7).

8. REVIEW OF THE BRENTWOOD LOCAL PLAN EVIDENCE BASE

8.1 The purpose of this section is to provide a brief overview of the evidence base as it relates to West Horndon to ascertain whether the evidence supports the Council's position not to allocate this land for growth.

Green Belt Study (November 2018) prepared by Crestwood Environmental

8.2 The Green Belt Study states that it is not intended to be an assessment of the policy position, but rather to provide contextual information for reference in relation to the emerging Brentwood Local Plan.

8.3 In terms of Green Belt contribution, the subject lands at West Horndon is identified as having a moderate overall contribution to Green Belt purposes (page 92). The Report identifies that the site abuts a large built up area 'urban' extension and benefits from partial enclosure. In terms of the sites contribution to the purposes of the Green Belt, the key points arising from the report are as follows:

- In terms of Purpose 1 'to check the unrestricted sprawl of large built – up areas' the commentary on the subject land states *“strong containment by West Horndon A127. Parcel does not extend beyond existing spatial extents of West Horndon”*.
- On purpose 2 *‘to prevent neighbouring towns merging into one another’* the Study confirms that *there are substantial / strong physical barriers stating that the “Parcel does not extend beyond existing spatial extents of West Horndon”*.
- Purpose 3 *‘to assist in safeguarding the countryside from encroachment’* the sites comprises Functional Countryside.
- Purpose 4 *‘to preserve the setting and special character of historic towns’* the sites has a limited relationship with a historic town.

8.4 While the subject land is identified as having a moderate contribution this is based solely on purpose 3 given that it comprises of functional countryside. It is notable that 79% of the sites assessed in the Green Belt study form part of the Functional Countryside, 11% have Mixed Functions within the Countryside while just 9% have Limited Countryside Functions. This serves to illustrate that given the Council have accepted that a certain amount of green belt release will be necessary in order to meet housing needs, it is inevitable given the majority of the sites assessed are within the Functional Countryside, there will be some loss of this land with this contribution to the green belt.

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- 8.5 It is notable there are other sites with an identified greater contribution towards the Green Belt which are allocated for development notwithstanding this fact, such as Dunton Hills Garden Village which is identified as having a moderate to high overall contribution to Green Belt purposes (page 88). Given that DHGV contributes towards 3 of the 4 purposes of the Green Belt, it is considered that a moderate to high overall contribution is a potentially understated assessment.

Site Assessment Methodology and Summary of Outcomes Strategic Sites (January 2018)

- 8.6 The main crux of this Site Assessment report is to support the identification of suitable Green Belt urban extensions to achieve a sustainable strategic release of land which has been recognised in the spatial strategy. On this basis three strategic sites were identified which included Brentwood North, West Horndon and Dunton Hills Garden Village. The Report states that each of these strategic options provides an opportunity to create large scale comprehensive developments that could support the provision of significant infrastructure improvements. The appraisal of the strategic options is covered in the Sustainability Appraisal.
- 8.7 In terms of the approach it is not clear the reasoning for determining the subject land at West Horndon is a strategic site rather than an urban extension. The report does not detail the classification used but regardless it is submitted that the subject land at West Horndon could in its own right be assessed as an urban extension.

Sustainability Appraisal

- 8.8 Icenis has undertaken a review of the Sustainability Appraisal (SA) report which accompanies the Local Plan, attached at Appendix 8.
- 8.9 The various iterations of the SA undertaken during the plan preparation have highlighted the benefits of accommodating growth at West Horndon and with a particular focus around transport – led development growth. There were no significant negative effects identified against any of the SA Objectives in relation to an urban expansion at West Horndon.
- 8.10 The use of the incorrect housing figure is a fundamental flaw within the SA as this contradicts the key objective which the Local Plan seeks to address, i.e. residential growth across the borough to meet the minimum housing requirements.
- 8.11 In addition, insufficient consideration has been given to the urban expansion / new settlement options at West Horndon considered by Thurrock as part of the Issues and Options (Stage 2) consultation. Whilst it is acknowledged that limited details are available at this stage for this to be fully considered within the Brentwood Local Plan, regular reviews of this option should be undertaken to ensure a coordinated approach to the delivery of the Brentwood and Thurrock Local Plans.

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- 8.12 On this basis, the SA recommends that a joint spatial strategy between DHGV and urban expansion at West Horndon (west) is adopted within the Local Plan to ensure that housing targets are met in the most sustainable way. The SA identifies that there are no greater impacts as a result of this option when compared to the options assessed and in fact, this is the only option in the SA which meets the Council's housing requirement.

Infrastructure Delivery Plan

- 8.13 The Infrastructure Delivery Plan (IDP) sets out the capacity and opportunities for key infrastructure within a living document to allow for regular updates over time.
- 8.14 The IDP refers to the West Horndon New Transport Interchange which it states will be created through phases in the medium term. The Plan fails to provide any firm indication of the timescales or the extent of the upgrade which is surprising given the fact that the Council accept that the enhancements to West Horndon station are critical to the delivery of the growth south of the borough. The IDP identifies that the new interchange will cost £12.5 million – it is unclear how this cost was calculated. This is considered further in the attached Transport Note prepared by Icen Projects attached at Appendix 11.

Landscape Sensitivity and Capacity Study (October 2018)

- 8.15 The purpose of this report is to identify the least sensitive sites in landscape terms which should be prioritised for development. The report states that after four sites identified as the highest priority sites for development, the subject site (37D) falls within the subsequent category '*are also recommended to be **preferentially prioritised for Housing Development** due to their Medium-High Landscape Capacity for this type of development*'.
- 8.16 Whereas DHGV is identified as having a medium – low capacity so is not prioritised for development in the report. This is illustrated on Appendix L5 of the Landscape Report attached at Appendix 9 to these representations.
- 8.17 The landscape study therefore fully supports, and in fact identifies that the subject site at West Horndon should be prioritised for housing development.

Housing and Economic Land Availability Assessment (October 2018)

- 8.18 The HELAA was published alongside the Local Plan. The EASL lands are identified as 37D promoted for mixed use residential led development which the HELAA states is suitable, available and achievable for housing. The HELAA states the estimated delivery timeframe 1-10 years (Deliverable site) and part of site is within high risk surface water flooding area (approximately 2.39ha, 4% of gross site area).

The Dunton Area Landscape Corridor Design Options Local Plan Green Infrastructure (Dec 2017)

- 8.19 Place Services were commissioned by Basildon Borough Council and Brentwood Borough Council to undertake a broad scale landscape assessment and present proposals for a landscape buffer and green corridor that could encompass the borough boundaries and give visual separation between two potential residential development sites. These two sites represent an urban extension to Basildon on its west side and a new 'Garden Village' settlement based on the Dunton Hills area. This document sets out the analysis undertaken and the scheme options proposed.
- 8.20 This study is guided by the two councils' draft local plans for future strategic development, and the project requirement to ensure that there is a visual separation between the potential new settlement areas. The work is intended to investigate the following aspects:
- Whether a corridor can be provided to achieve visual separation;
 - Whether there are opportunities to use this landscape corridor to improve biodiversity and recreational connectivity;
 - Whether there are opportunities for the corridor to be traversed by local highway connections.
- 8.21 The proposed landscape corridor has been broadly illustrated in the report through three options. These three options provide different land areas, broad connecting transport alignments, and land use locations. There are elements which can be interchanged between the three options and all will need to be subjected to further detailed design. They can be categorised as follows:
- Scheme 1 – Minimum Recommendation: This scheme shows the minimum land area required to achieve a corridor with an element of visual separation. (landscape corridor of 95ha)
 - Scheme 2 – Intermediate Recommendation: This scheme shows a larger land area and will achieve a more effective element of visual separation. (landscape corridor of 138ha)
 - Scheme 3 – Most Recommended: This scheme shows the more desirable land area required to achieve visual separation. (landscape corridor of 159ha)
- 8.22 This report clearly has implications on the future masterplan for DHGV and the quantum of development this site can accommodate. It is not clear why this document does not form part of Brentwood's Local Plan evidence base or whether this has been addressed through the allocation at DHGV (Policy R01). This should be addressed prior to the submission of the Plan to the Secretary of State for Examination.

Conclusion

- 8.23 In view of the above brief critique, it is clear the evidence base fully supports the allocation of this site. The subject land at West Horndon is suitable, available and achievable. The landscape evidence identifies that the subject land should be preferentially prioritised for housing development.
- 8.24 The evidence base simply does not support the steadfast position of Brentwood Council to refuse to accommodate growth at West Horndon – the case remains that this is an optimum location for development, on an existing train station which should be maximised in the Local Plan to assist in the future growth of the borough.

9. VISION FOR WEST HORNDON

- 9.1 EASL appointed AECOM to undertake masterplanning in respect of the lands at West Horndon, focused primarily on land to the north of the railway line (Brentwood Lands). The preparation of a Masterplan Report has been completed, which provides a comprehensive summary of the work carried out by all technical and design consultants to date (Appendix 10). In addition, Thurrock Council has identified the potential for a New Settlement at West Horndon in the Stage 2 Issues and Options Consultation (December 2018). The vision for West Horndon, with a focus on the Thurrock lands, is detailed within the Delivery Statement attached at Appendix 1.
- 9.2 The vision of West Horndon (Brentwood lands) is to deliver approximately 900 new homes set within an attractive, landscaped setting defined by new watercourses and water bodies. The development will provide convenient walking and cycling access to West Horndon railway station and a new direct link to Thorndon Country Park in the north. Homes will be centred on a village green which will be fronted by a new primary school, local shops and a care home to provide for everyday needs of new and existing local residents. A new employment area of approximately 4ha in the north-eastern corner of the site will provide much-needed accommodation for local and medium-sized enterprises with visibility and access off the A127. New employment provision incorporated as part of the overall mixed-use development would also contribute towards mitigating the impact of the loss of the West Horndon Industrial Estate for new residential development. The nature of the site and the existing infrastructure will enable the site to come forward at the beginning of the Local Plan period with no long lead in time.
- 9.3 EASL has undertaken a significant amount of technical studies and consultation with key stakeholders to present a 'deliverable proposal' for the subject lands. The key aspects of the proposed, informed by a range of technical studies, are summarised as follows:
- The Site would deliver significant benefits to meet the needs of the local community and maximise the efficiency of investment in existing infrastructure. The merits of locating growth in proximity to public transport has been endorsed in the Framework. The Site should therefore be considered sequentially preferable to a number of larger scale sites in the Borough in meeting the Council's housing need;
 - Sensitive, landscape-led development at West Horndon would result in a settlement comparable to the scale of existing scattered villages across the borough and contribute towards the proposed upgrade of West Horndon on the settlement hierarchy;
 - The emerging West Horndon masterplan responds directly to the underlying landscape character and uses multi-functional Green Infrastructure as the framework for the development parcels.

The Site would be seen as part of, and an extension, to the existing village settlement of West Horndon in the landscape thereby limiting the impact on surrounding landscape;

- Development of the Site can provide all public open space and green infrastructure within land controlled by the landowners;
- The attached 'access triangle' diagram (Appendix 7) also promotes the significant benefits that could afford DHGV in upgrading the local transport network, mitigating future impact on existing residents and reducing stress on Station Road which at present is the main road to be relied upon by the DHGV development;
- The public transport opportunities at West Horndon are deliverable, effective and have significant cost benefits. Further, EASL has signed a Memorandum of Understanding with train operator c2c that would allow for a phased approach to the investment of the station in co-ordination with enabling development and respective Local Plan timetables, with S106 / CIL being utilised to deliver strategic transport improvements. All of this is of benefit to the FEMA of Thurrock and Brentwood to provide a quality service which suits the needs of customers.
- A key opportunity for this development is to provide much needed education facilities to address the existing shortfalls and to serve future residents. The proposal provides for a primary school close to the station to encourage the use of sustainable transport for journeys to and from school;
- An opportunity to enhance the vibrancy of the area through providing aspirational and attainable housing for all; from start-up apartments to five-bedroom family homes, homes for the ageing population and potential for self and custom-build, placemaking will be at the heart of the West Horndon vision;
- Development of the Site would not have an impact on any surrounding listed buildings. There are no heritage assets on the Site;
- In terms of access to green infrastructure for the community and wildlife, development at West Horndon will sit within an attractive rural setting, within close proximity to Thorndon Country Park (access to which will be enhanced through new movement routes and linkages), which when linked with wider proposals delivers a green access corridor that could connect with Langdon Hills;
- The location of the Site within the Functional Economic Market Area highlights the opportunity available to locate employment in this area to benefit from excellent broadband connectivity. New employment provision incorporated as part of the overall mixed-use development would also contribute towards mitigating the impact of the loss of the West Horndon Industrial Estate for new residential development.

10. CONCLUSION

- 10.1 These representations have set out how the Pre-Submission Local Plan, in its current form, fails to meet the tests of soundness set out in para 35 of the Framework as the Local Plan is not positively prepared; the Plan fails to set out an appropriate strategy in order to meet the strategic requirements; the failure of any cross boundary work to consider whether the Plan can meet housing requirements in adjoining authorities means the Plan is not effective and the Plan is not consistent with national policy, particularly in terms of the release of Green Belt which the Framework requires first consideration should be given to locations served by public transport.
- 10.2 The Local Plan acknowledges that the Council will maintain a watching brief on matters such as joint strategic work across South Essex. As detailed in these representations it is considered that Brentwood need to address a host of cross boundary issues in order to satisfy their duty to cooperate obligations. In any case it is considered that an early review of the Local Plan following the publication of the JSP should be committed to within the Local Plan, otherwise the Plan is unsound in this respect.
- 10.3 These representations demonstrate that the Council have fundamentally under estimated their housing needs. The Plan is currently seeking to meet the absolute minimum housing requirement and in this respect is not positively prepared as it has not tested its ability to assist with unmet need from adjoining authorities.
- 10.4 The SA confirms that there are no greater adverse impacts of a combined West Horndon and DHGV growth option when compared with the other alternatives assessed in the SA. In fact, this is the only option which meets the Council's housing requirements and therefore should be carried through into the Local Plan.
- 10.5 The published evidence base wholly supports growth at West Horndon, in particular the Green Belt Study and the Landscape Sensitivity and Capacity Study, which highlight the limited contribution of this site towards the purposes of the Green Belt and due to the site characteristics, that this site should be prioritised for housing development in the Local Plan. There is nothing within the evidence base which supports keeping this site in the Green Belt particularly given that national policy requires plan-makers to give first priority to land served by public transport when releasing land from the Green Belt.
- 10.6 EASL urges the Council to urgently address these matters in advance of the submission of the Local Plan for examination to the Secretary of State. EASL confirm that they wish to take part in the Examination in Public of the Local Plan.

A1. WEST HORNDON DELIVERY STATEMENT

West Horndon

DELIVERY STATEMENT MARCH 2019



i | Executive Summary

Estates & Agency Strategic Land (EASL) welcomes the identification of West Horndon as a potential new settlement in the Thurrock Issues and Options Consultation (December 2018). West Horndon should be a priority location for strategic growth within the emerging Local Plan, which is fundamental in delivering Thurrock's ambitious growth agenda.

West Horndon is a golden opportunity that would bring great benefits for Thurrock through a holistic development. The goal is to deliver aspirational housing in a range of tenures to meet Thurrock's identified housing need in a sustainable form which simultaneously improves infrastructure and amenity for existing and future residents. West Horndon has the potential to enhance and diversify employment and business opportunities in the local area, enabled by access to high speed broadband. The advantages of development of the site, which is immediately adjacent to a train station (regular existing services to Fenchurch Street in 27 minutes), can be realised as part of a comprehensively planned area which transforms the station into a multi-modal transport hub.

Promotion of the land at West Horndon has the potential to enhance the rail station facilities, provide a station hub, include provision for a primary and secondary schools and accommodate a higher density of development at an exceptionally sustainable location in accordance with the aims of the National Planning Policy Framework.

A holistic settlement strategy for West Horndon would also bring wider benefits for Thurrock, fulfilling the objectives and vision for South Essex. West Horndon will unlock previously undervalued infrastructure connections; drive forward greater, varied economic growth for the region and deliver a truly sustainable solution to Thurrock's housing requirements.

West Horndon is both viable and deliverable in the short-term with uncomplicated land ownership; a committed and invested promoter and existing infrastructure. West Horndon will also be of sufficient size to deliver planned additional infrastructure from the outset; with vital services such as secondary and primary schools and a medical centre delivered when they are needed.

The strategy for West Horndon establishes:

- A greater sense of arrival at the train station and with community facilities in the vicinity;
- Highly deliverable development utilising existing infrastructure, negating the need for large scale strategic infrastructure provision that might otherwise be needed of support the development of major urban extensions;
- The critical mass of development and physical space needed to support to the provision of the full range of community facilities to create a village centre and the 'heart ' of the development (primary / secondary schools, primary health facilities and retail/service uses);
- Limited number of land owners involved, which further increases deliverability of the project;
- Reintroduction of Fenland wetlands landscape and an effective water management strategy which will result in a net biodiversity gain through establishment of wetlands as a habitat;
- Recreation and open space; and
- Quality place making.

Phase 1 Masterplan



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1 | Introduction

Land at West Horndon is a greenfield, Green Belt site that lies to the immediate south of the existing village of West Horndon. The site is located directly adjacent to West Horndon rail station (C2C Fenchurch Street to Shoeburyness railway line).

The site is identified as a potential new settlement within the Thurrock Issues and Options Stage 2 Consultation (December 2018). EASL have commissioned extensive ongoing technical studies – landscape, transport, ecology, utilities planning, drainage and costs - in respect of the landholding which has fully informed the proposals. The purpose of this document is to demonstrate that this site has the unique characteristics in which to incubate a New Settlement that meets the needs and objectives of Thurrock Council.

EASL also has interest in land at West Horndon within Brentwood Council, to the north of the railway line. This Delivery Statement focuses on the Thurrock landholding.

The submission is structured as follows:

- The Site sets out the key characteristics of the subject site, highlights the opportunities presented by the site along with a review of the key constraints;
- The Vision details how a new settlement could be delivered at West Horndon influenced by the key characteristics detailed in the previous section of this document;
- West Horndon will be an exemplar New Settlement as detailed in the section “What makes West Horndon so unique?”, which highlights the key attributes of this proposal demonstrating that this is the right location to concentrate growth in Thurrock;
- The Sustainable Development Scorecard was applied to the site and identified that there are opportunities to improve each of the economic, environmental and social dimensions that define sustainable development in accordance with the NPPF;
- EASL is actively engaged with the key stakeholders in the area who are fundamental in bringing forward the vision for the site as detailed in the Local Leadership and Community Support section;
- The Benefits Case sets out a summary of the economic and community benefits anticipated to be delivered at a new settlement at West Horndon; and
- A Deliverable Reality sets out the high level analysis that has been undertaken which provides detail of the potential governance model and the delivery timescale for the development.

An aerial photograph showing a complex highway interchange with multiple lanes and overpasses. The surrounding landscape includes a large green golf course in the lower right, industrial buildings and parking lots in the middle ground, and various green fields and trees. The text 'Thurrock is a place of considerable change' is overlaid in white on the upper left portion of the image.

Thurrock is a place of considerable change

2 | The Site

LOCATION

West Horndon is located in the north of the borough of Thurrock in Essex. It is located 20 miles (32 km) north-east of London.

Although there has been a settlement in the area since the 11th century, the vast majority of the village of 700 households were constructed in the 1950s with later additions following sporadically thereafter. The population of the wider West Horndon parish is approximately 1,800.

West Horndon is on the C2C Fenchurch Street to Shoeburyness railway line and benefits from a very frequent service (4 trains an hour at peak times) connecting the land at West Horndon to the City of London in less than 30 minutes.

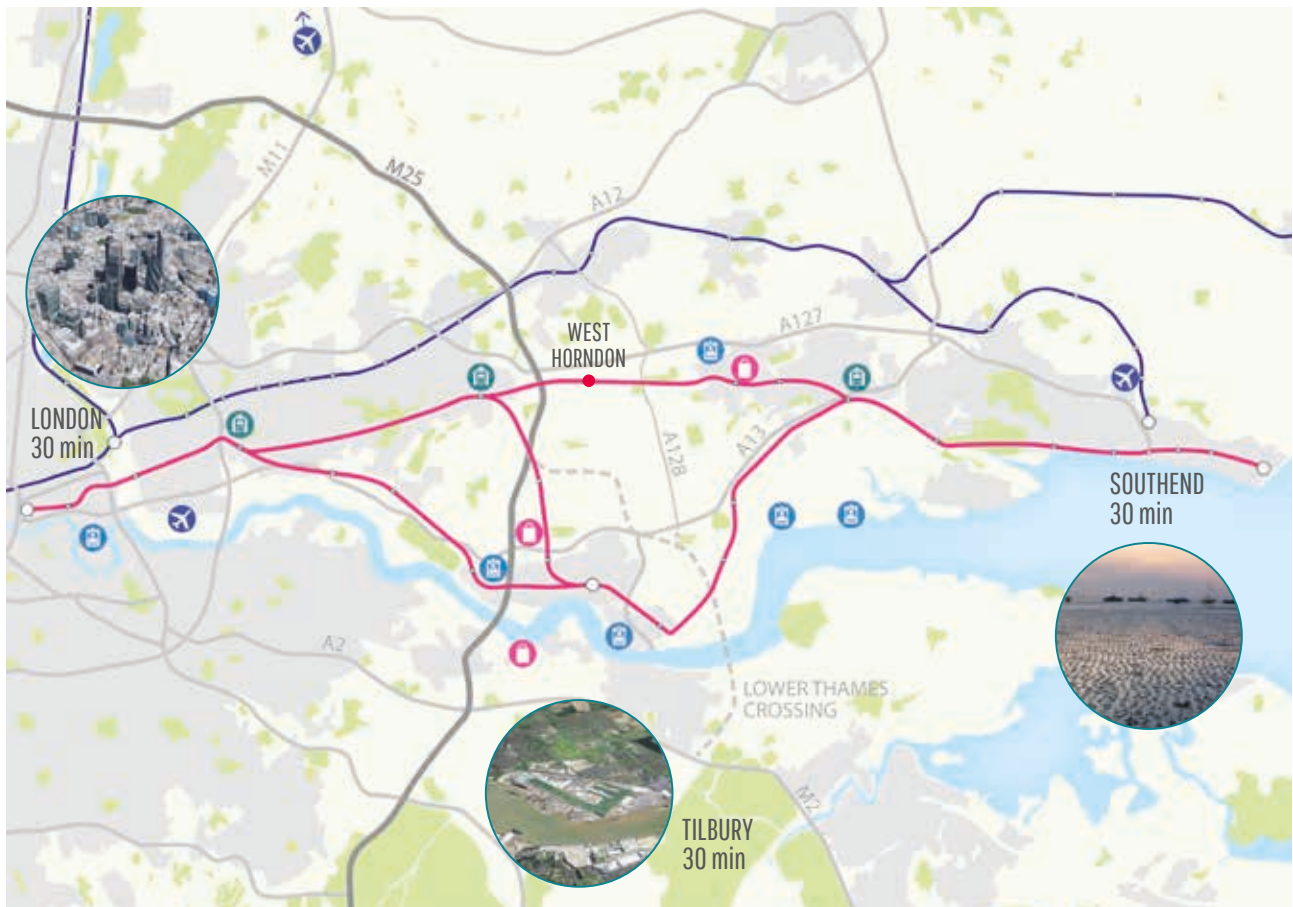
Southend lies to the east of West Horndon, also connected to the site by the existing train line. The Port of Tilbury and London Gateway Port lie to the south of the site. There are a host of local employment centres in close proximity to the subject site offering varied job opportunities.

As illustrated on the plan overleaf West Horndon is the only station on the existing c2c line which has not yet been developed for housing, serving just 700 homes at present. This is a paradox when viewed alongside the other existing rail stations in the region. This is an ideal opportunity for Thurrock to utilise existing infrastructure in order to deliver their growth agenda and the core objective of providing the right infrastructure in the right location at the right time.

West Horndon has the potential to enhance and diversify employment and business opportunities in the local area, enabled by access to high speed broadband.

WEST HORNDON IS IN A STRATEGIC LOCATION

SETTLEMENT HAS ACCESS TO A WIDE RANGE OF OPPORTUNITIES & AMENITIES



2 | The Site

WEST HORNDON IS CLOSE TO LOCAL EMPLOYMENT CENTRES

SETTLEMENT BENEFITS FROM VARIED JOB OPPORTUNITIES CLOSE TO HOME



WEST HORNDON HAS AN UNDERUTILISED RAIL STATION

OPPORTUNITY TO IMPROVE & THEN BUILD OFF THIS EXISTING INFRASTRUCTURE



2 | The Site

THE OPPORTUNITIES

Housing

In order to meet their housing needs, Thurrock Council acknowledge that Green Belt land is required to be released. The subject land is ideally situated to provide much needed housing to the area, helping to alleviate supply shortages for those who work in nearby areas of Thurrock and London. In accordance with the National Planning Policy Framework there are clear evident 'exceptional circumstances' to justify the release of the subject land from the Green Belt in order to assist in meeting the Council's housing needs.

Housing at West Horndon given its unique location within the north of the borough will deliver a new type of housing of varying type, size and style, design and tenure mix including affordable housing and older people's housing within a distinctive setting and landscape.

Economic

West Horndon has the potential to act as a key employment site and provides an opportunity to diversify the employment options within the area connecting business spaces and premises; quality access infrastructure, including road and rail linkages that facilitate effective movement of goods and people; and a broad mix of good quality housing.

West Horndon as a new employment destination can attract high value-added inward investment - Thurrock has significant economic assets that demonstrate its ability to attract large scale investment. The Thurrock Economic Strategy identifies that to change the nature of inward investment, which at present concentrates on lower-value employment opportunities, image and perception needs to be tackled, this includes addressing the quality of the physical and natural landscape across the Borough. West Horndon is pivotal in assisting the Council deliver on their economic objectives.

Access and Movement

A new settlement at West Horndon will enable enhancements to the existing train station and deliver infrastructure upfront. In May 2017, C2C and EASL signed a memorandum of understanding in relation to the redevelopment of West Horndon Station.

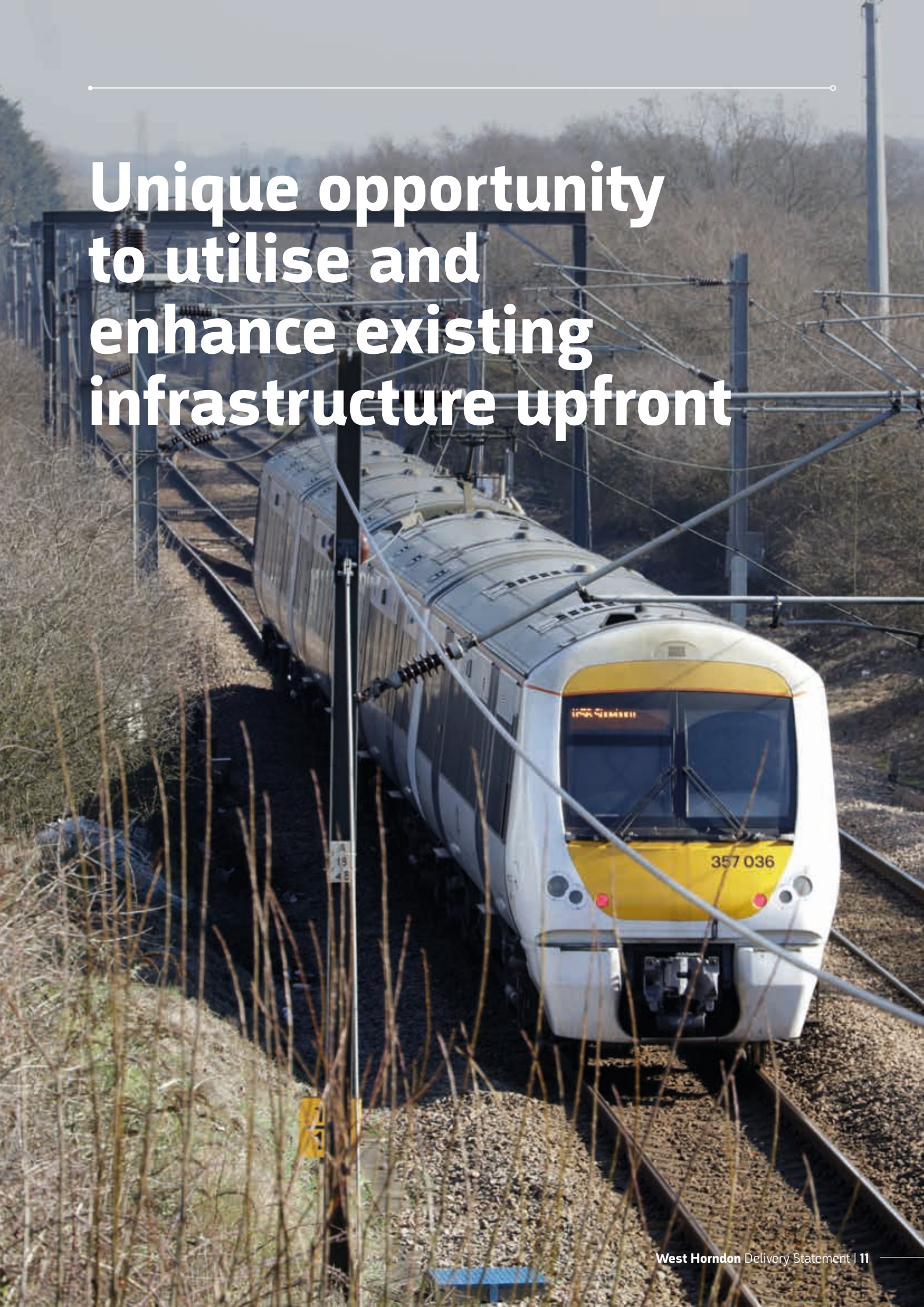
Development of this site offers the potential to utilise and enhance transport infrastructure in order to provide a range of options for access and movement across West Horndon and Thurrock. The potential exists to improve north/south connectivity by linking employment areas south of the A13 with residential areas to the north, to the benefit of those currently living and working in the area, as well as those in the future.

The site is well placed in context of the strategic road network and can link directly to the A128, as well as contribute towards the upgrade of existing road links and improvements to surrounding junctions, for the benefit of the wider community and to accommodate expected growth. Sustainable travel can also be enhanced with the opportunity to form a new multi-modal interchange using existing, under-utilised infrastructure. This includes investment in making improvements to the existing train station, the provision of a new bus interchange, and suitable facilities for pedestrian and cyclists.

Community

The extent and concentration of development provides the opportunity to support a full range of much needed community facilities to support the transformation and liveability of West Horndon including medical centre; retail and service uses; playing fields; sports pavilion; and walking paths.

Unique opportunity to utilise and enhance existing infrastructure upfront



2 | The Site

TECHNICAL MATTERS

The key technical matters in relation to the site are:

Flood Risk

Significant areas of land identified fall within Flood Zones 2 and 3. Due to the very flat nature of the site further work is proposed to define the flood risk zones in the future with a view to extending the potential built development areas.

Waterbodies

Ponds and ditches should be retained within green space and integrated into the sustainable drainage system along with new attenuation basins.

Public Rights of Way

Footpaths across the site should be retained within the green infrastructure network where possible.

Landscape Character

The landscape and visual impact assessment work undertaken to date identifies that where there are limitations to development, the most important limitations are capable of mitigation and residue effects would be predominately localised.

Utility Easements

Power lines supported on pylons run across part of the site. Development should be avoided on the alignment of the lines.

Consideration should be given to undergrounding the lines in the future. Underground utilities easements shown on plan represent a major constraint to development.

Drainage

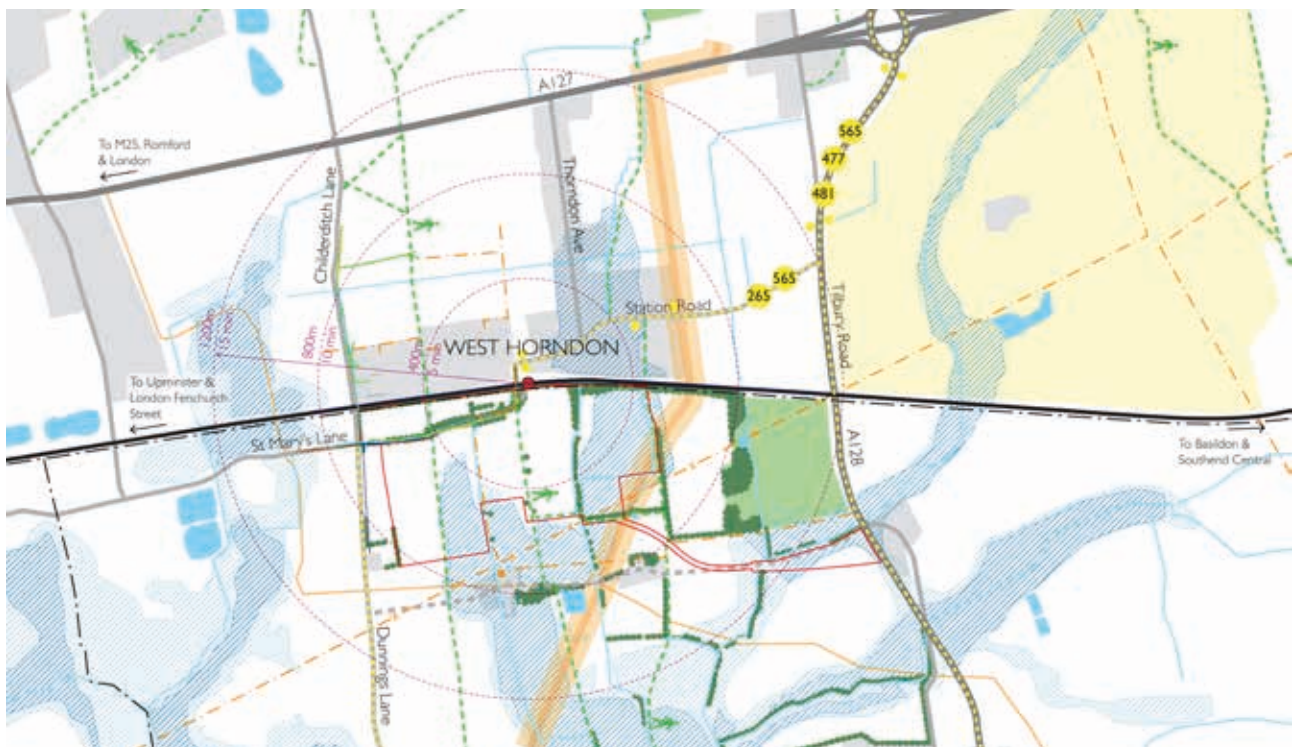
In terms of drainage PBA have registered the site with Anglian Water who have confirmed there is capacity at Upminster WRC. Further hydraulic modelling will be required in order to assess the impact on the existing sewer network and the extent of upgrade works required.

Connections over the Railway

As part of the technical analysis EASL undertook an analysis of the access options which confirmed that increased two way capacity of the existing bridge or introduction of a new bridge incurred cost / time / risk penalties which did not add value. Further there was a risk of additional am peak rat-running along St Marys Lane. As part of Phase 1 enabling works EASL will deliver a new junction onto the A128 to the south of the railway line.

Woodland and Hedgerows

There are a number of small woodlands or shaws as well as trees along lines of watercourses and former hedgerows. The strategy is to retain these natural features wherever possible. The landscape plan will retain features of value where appropriate. That there is sufficient scope to not only mitigate any impacts on ecology, but also deliver significant, long-term enhancements compared to the existing situation.



2 | The Site

GENUINE INFRASTRUCTURE

EASL has signed a Memorandum of Understanding with c2c in respect of West Horndon Station. c2c are committed to working with EASL on the expansion of West Horndon to encourage greater rail use and patronage at this location.

The New Settlement will deliver enhancements to the existing station to benefit existing and future residents. There is a clear commitment from c2c to support future investment in the station as demonstrated in the signed MOU with EASL.



An aerial photograph of a rural landscape. The scene is dominated by a patchwork of agricultural fields in various shades of green and brown, indicating different crops or stages of growth. A network of roads and paths crisscrosses the area, with a prominent road running diagonally from the upper left towards the center. A small pond or reservoir is visible in the middle-right section. The overall impression is one of a well-organized, productive rural environment.

Uncomplicated land ownership

2 | The Site

PLANNING POLICY

The site currently lies within the Green Belt. Thurrock Council is preparing its new Local Plan, which, when adopted will supersede the Local Development Framework (December 2011). It is anticipated that the Thurrock Local Plan will be adopted in 2022.

The Issues and Options Consultation sets out in broad terms the spatial options where new development should be located which includes the two options at West Horndon – a new settlement of 10,000 homes or a small urban extension of 1,500 homes. In terms of opportunities the Consultation identifies the following:

- A limited number of land owners, potentially increasing the deliverability of the project;
- Potential opportunities to bid for Government funding to support the delivery of strategic infrastructure; and
- Critical mass of development that could help to secure the infrastructure needed to support the development.

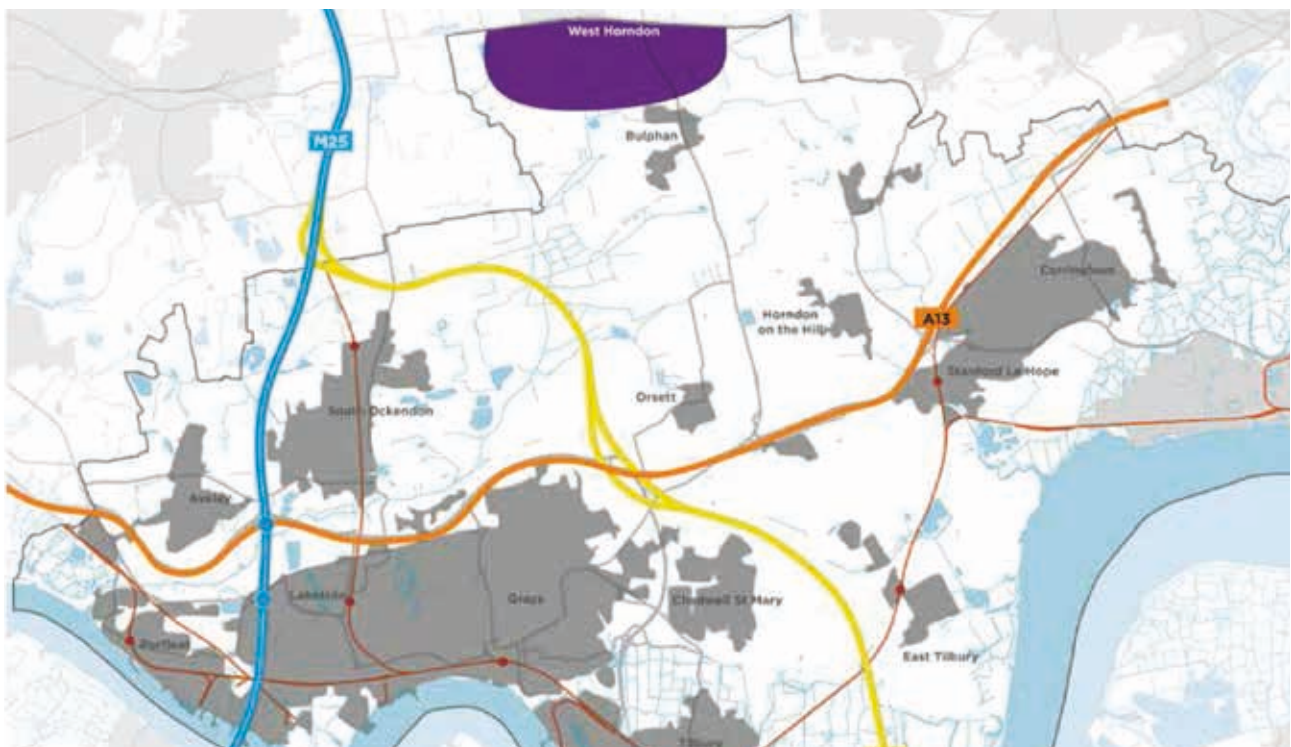
The identified challenges in the Issues and Options Consultation are as follows:

- Given the location in the north of the borough, development at West Horndon has challenges in providing a range of market and affordable housing to meet the needs of the

existing residents of Thurrock. North-south connectivity would need to be improved so as to ensure spin-off economic benefits for existing businesses located within the existing Thurrock urban area;

- The development of a new settlement of a significant scale at West Horndon would require considerable public and private sector investment in order to provide supporting community infrastructure and upgrade the A127;
- Significant development at West Horndon would further exacerbate recognised capacity issues on the A127 corridor; and
- Development of scale south of the railway line at West Horndon could have significant environmental implications in terms of impact on the Green Belt and landscape character, and flood risk considerations.

An alternative option at West Horndon is a small urban extension (Figure 20). The opportunities for small urban extensions are detailed which include that such extensions are identified as in line with the requirements of private sector housebuilders; are usually less complex in terms of infrastructure requirements; make good use of historic investment in infrastructure; and reduces/disperses the impact of new development and limit the impact on the Green Belt.



A golden opportunity that would bring great benefits for Thurrock through a holistic development

3 | The Vision

The masterplanners for the site, JTP, has prepared a cohesive masterplan for Phase 1, informed by the work of the wider consultant team, that delivers a sustainable extension to West Horndon. The focus of this document is the West Horndon landholding within Thurrock however a key consideration of all work undertaken on this site is how this relates to the wider area from the outset.

The initial work undertaken by JTP included analysis of the historical growth of West Horndon, visual analysis of the site and surrounding context and high level capacity studies. It identified key benefits of expanding West Horndon to the south, in particular the opportunity to utilise existing rail infrastructure with excellent links to employment centres. EASL has undertaken a significant amount of technical studies and consultation with key stakeholders to present a 'deliverable proposal' for the site.

The technical studies undertaken to date confirm the following:

- The Site could deliver significant benefits to meet the needs of the local community and maximise the efficiency of investment in existing infrastructure;
- The merits of locating growth in proximity to public transport fully accords with the NPPF. The Site should therefore be considered sequentially preferable to a number of larger scale sites in the Borough in meeting the Council's housing need;
- Sensitive landscape-led development at West Horndon would result in a settlement comparable to the scale of existing scattered villages across the borough and contribute towards the proposed upgrade of West Horndon on the settlement hierarchy;
- The emerging West Horndon masterplan responds directly to the underlying landscape character and uses multi-functional Green Infrastructure as the framework for the development parcels. The Site would be seen as part of, and an extension, to the existing village settlement of West Horndon in the landscape thereby limiting the impact on surrounding landscape;
- The public transport opportunities at West Horndon are deliverable, effective and have significant cost benefits. These necessarily relate to improved surface access to the station and the phased increase in bus frequency which co-ordinates with the train timetable, and ultimately with increased frequency with patronage. Further, EASL has signed a Memorandum of Understanding with train operator c2c that would allow for a phased approach to the investment of the station in co-ordination with enabling development;
- There is an opportunity at West Horndon to provide a mix of aspirational housing types, including a significant number of apartments which may appeal to both the first time buyers market and people wishing to down size;
- Development of the Site would not have an impact on any surrounding listed buildings. There are no heritage assets on the Site; and
- In terms of access to green infrastructure, development at West Horndon will sit within an attractive rural setting, within close proximity to Thorndon Country Park (access to which will be enhanced through new movement routes and linkages).

Phase 1 Masterplan



-  TRAIN STATION
-  EMPLOYMENT
-  MEDIUM DENSITY RESIDENTIAL
-  HIGH-MEDIUM DENSITY RESI
-  MEDIUM-LOW DENSITY RESI
-  MIXED USE
-  SUPERMARKET
-  SHOP
-  PUB
-  PRIMARY SCHOOL
-  SECONDARY SCHOOL
-  PARKLAND
-  RESTORED FENLAND

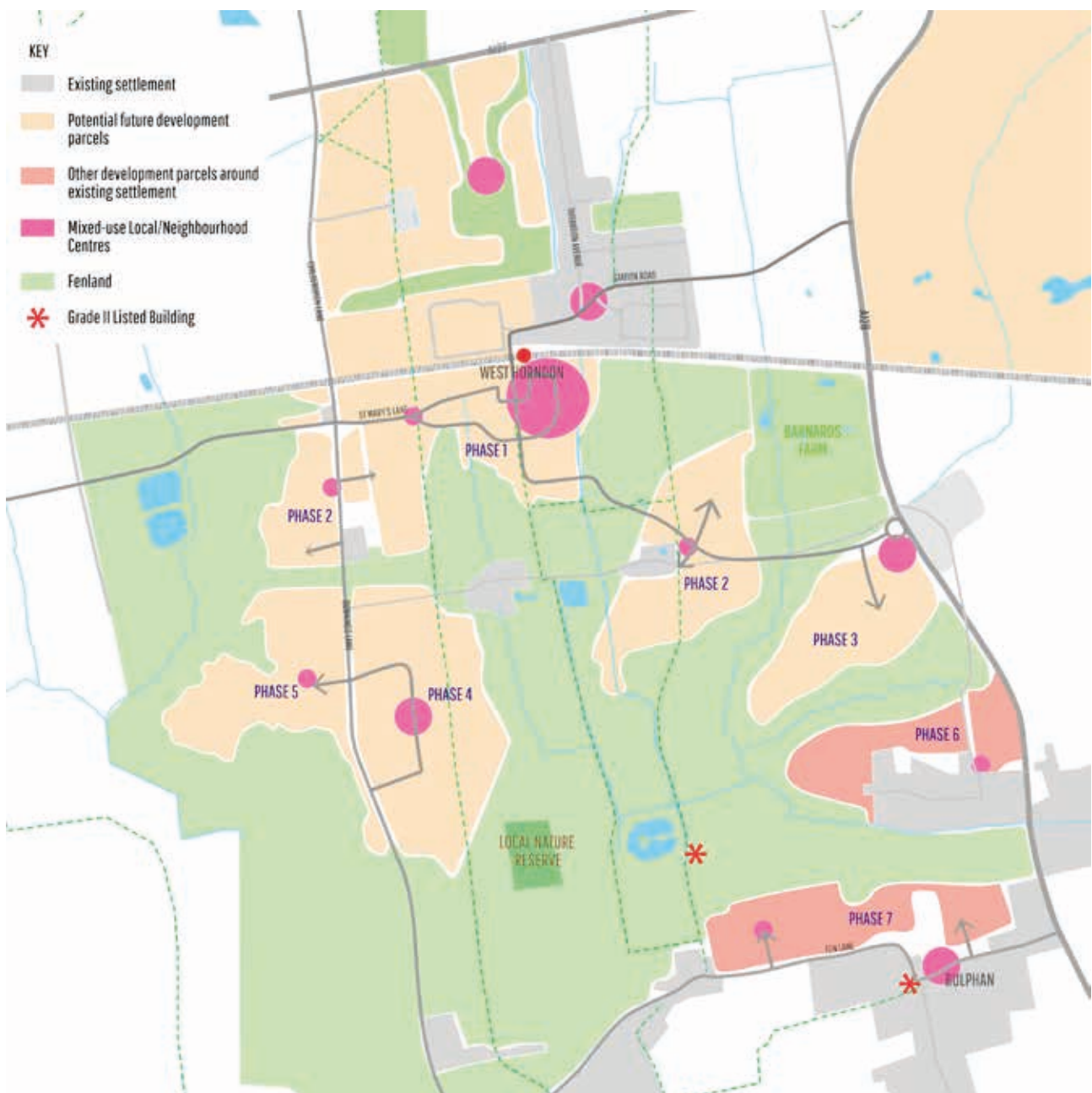
3 | The Vision

The initial masterplan for the site demonstrates the deliverability of 1,500 homes adjacent to the station, to the south of the railway line, which will be accompanied by a host of infrastructure including primary and secondary schools, village hub with local shops and services and a medical centre. This is the logical first tranche of development on this site. This forms the first phase of the new settlement which as illustrated below would comprise a ring of small villages around a central fenland which would offer an exceptional

living environment within the landscape with access to a range of employment opportunities and excellent public transport links.

The Masterplan identifies potential development of the land to the north of West Horndon station, which lies within Brentwood. The vision for the Thurrock lands is not reliant in any way on the Brentwood lands and simply in the interests of place making the vision has ignored boundaries.

Wider Masterplan for New Settlement at West Horndon



4 | What Makes West Horndon So Unique?



INFRASTRUCTURE LED

West Horndon is a prime site, with existing infrastructure ready and waiting to deliver new homes, jobs and infrastructure for Thurrock.



UNIQUE LOCATION

The site's location is wholly unique given it lies within the South Essex Housing Market Area and yet is just 28 minutes from the City of London on the existing c2c line.



DIVERSE HOUSING OFFER

It is an opportunity to enhance the vibrancy of the area providing aspirational and attainable housing for all; from start-up apartments to five-bedroom family homes, homes for the ageing population and potential for self and custom-build, placemaking will be at the heart of the West Horndon vision.



INVESTMENT

Growth will provide substantial benefits for the area and greater investment in enhanced infrastructure delivering the right infrastructure in the right place and at the right time.



GREEN INFRASTRUCTURE

Direct access to the open countryside and green infrastructure, development at West Horndon will sit within an attractive rural setting, within close proximity to Thorndon Country Park.



JOBS

West Horndon has the potential to support significant economic growth in the region securing successful employment growth and economic diversification in Thurrock



A DISTINCT OFFERING

West Horndon's location, nestled in the north of the borough, is considered an advantage in that will provide an entirely different offering in terms of housing and jobs than what currently exists in Thurrock. It will change the perception of what Thurrock can offer people in terms where they live and the employment opportunities.



EARLY DELIVERY

The nature of the site and the existing infrastructure will enable the site to come forward at the beginning of the Local Plan period with no long lead in time for a new settlement this is unprecedented.



NEW TRANSPORT HUB

Enhancements to the existing train station at West Horndon and increase in frequency of a co-ordinated bus service. Through our well-developed public transport strategy it will be possible to secure a significant mode share for bus and rail, both for peak commuting and off peak access to local education, healthcare, leisure and retail.



EDUCATION

A key opportunity for this development is to provide much needed education facilities to address the existing shortfalls and provide for future residents. The proposal provides for a primary and a secondary school close to the station to encourage the use of sustainable transport for journeys to and from school.



INCREASED CONNECTIVITY

It is proposed to create a new access road from the A128 to serve the site are intended within the early stages of the masterplan in order to ensure that the appropriate infrastructure is in place for the benefit of accommodating both existing and future movements across the highway network.

West Horndon Park Association



5 | Sustainable Development Scorecard

The National Planning Policy Framework (NPPF) has running throughout it *'the golden thread of sustainable development'*. However, with no clear-cut, NPPF-based assessment criteria to consider a project's sustainable development credentials current assessment is both complicated and subjective. The Sustainable Development Commission (SDC) was set up in April 2016 by Icenl to address this flaw in our planning system.

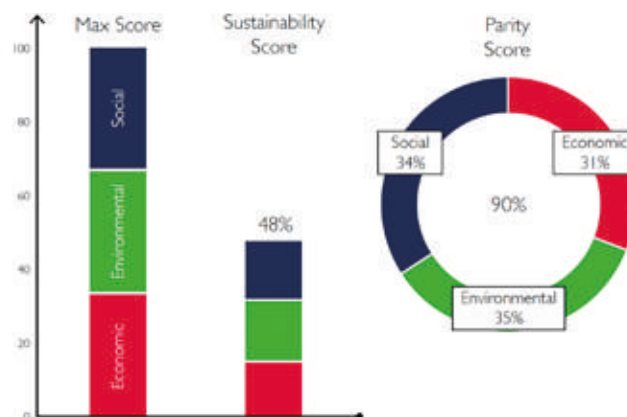
Chaired by former Planning Minister, Nick Raynsford, the SDC is made up of a balanced cross-section of industry professionals who have developed an assessment tool, hosted online, which seeks to bring some clarity to the concept of sustainable development – the Development Scorecard.

The Scorecard is intrinsically based within the context of the NPPF and its three equal pillars of environmental, economic and social sustainability. It is anticipated that by ensuring the SDC's end product complements the objectives of the NPPF, planning decisions will start to become more objective, transparent and consistent, and a wider, more stable understanding of sustainable development will begin to emerge.

By considering the principles of sustainable development outlined in the NPPF, the Scorecard is able to quantify the contribution the development proposals make towards sustainable development. This is broken down into two scores; an overall 'Sustainability Score' which assesses the total contribution from each of the three pillars, and a 'Parity Score' which determines how balanced the contribution is from each of the three pillars.

The Scorecard analysis shows that the proposed masterplan scores very well for the elements on the economic dimensions, due to the enhancement in community facilities and opportunities for employment as the development grows over time.

The proposed development will provide much needed housing to the area, helping to alleviate supply shortages for those who work in nearby areas and London. West Horndon provides a prominent location in which to accommodate additional growth due to the presence of a train station with frequent, sustainable connections to central London. The proposed masterplan also adds community facilities consisting of schools, medical centre, leisure and retail offerings, which will provide a sense of place to new residents, mitigating the risk of West Horndon becoming a dormitory settlement.



The graphs show that the existing settlement achieves a Sustainability Score of 48% and a Parity Score of 90%.

The Sustainability Score results of 48% indicates that the West Horndon village currently presents a low level of sustainability, with opportunities for improvements on each of the economic, environmental and social dimensions that define sustainable development in accordance with the NPPF.

Overall, the Parity Score result of 90% shows that the current settlement is well balanced across the village overall, with equal contributions from the economic, social and environmental pillars of sustainability.



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6 | Local Leadership & Community Support



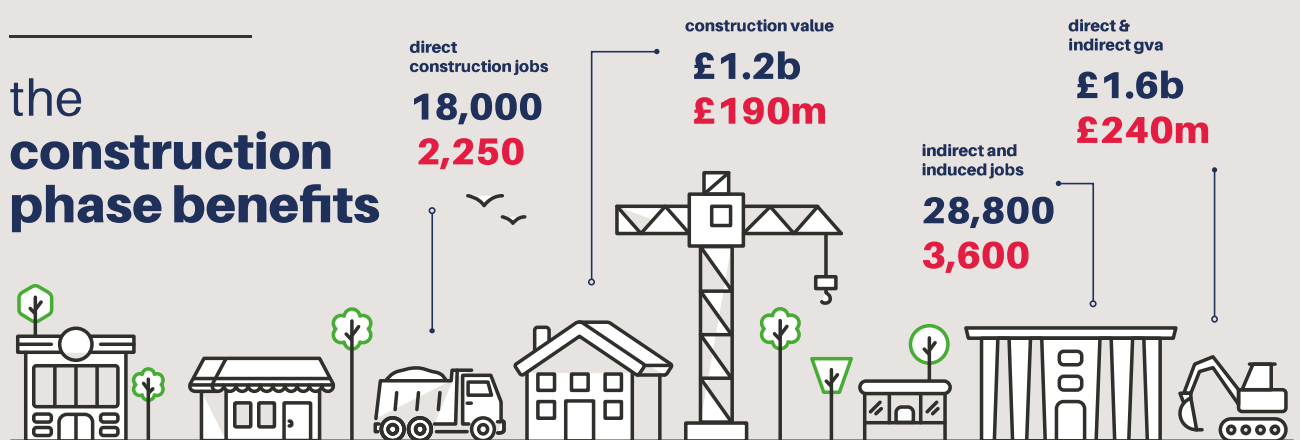
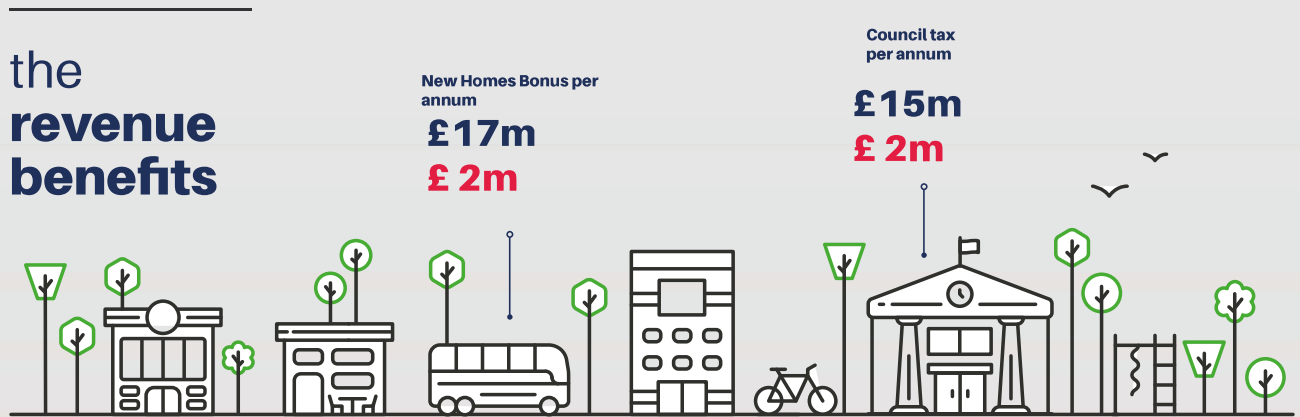
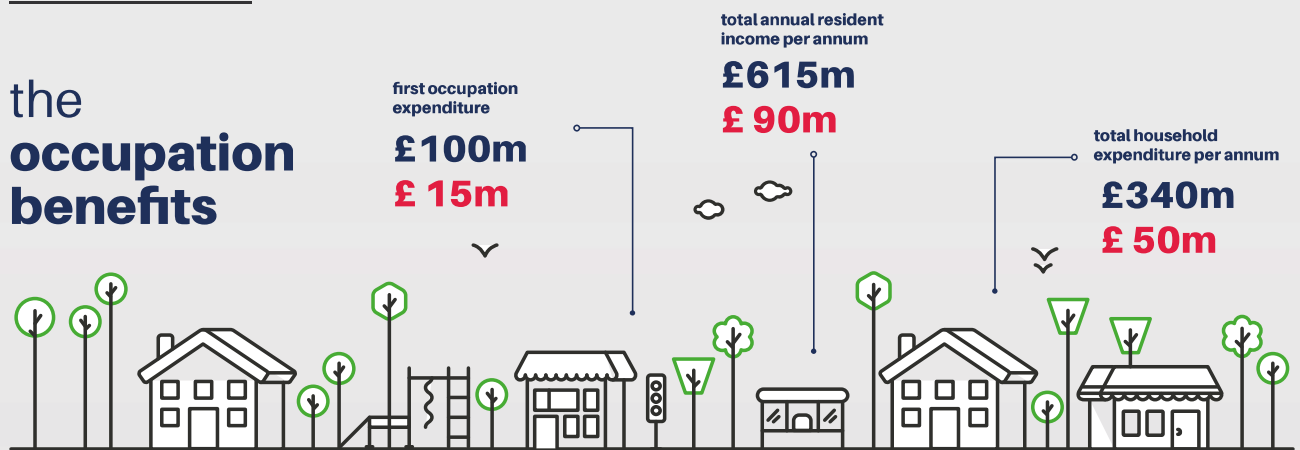
7 | Benefits of West Horndon



Economic Benefits West Horndon



This infographic provides an overview of the economic benefits that could be delivered through the development of a new settlement in West Horndon (**10,000 homes**) and separately, the benefits of Phase 1 (**1,500 homes**). The proposed settlement will provide a wide range of economic benefits for the surrounding area during both construction and occupation phases.



Conclusion: The proposed development of a new settlement in West Horndon will provide much needed high-quality residential dwellings in line with local needs and national agenda. The considerable economic benefits resulting from the delivery of the settlement will contribute positively to the local and national economy.

*Data based on: (1) Home Builders Federation Report: The Economic Footprint of House Building in England and Wales (2015); (2) ONS (2018); (3) Annual Population Survey (2018), (4) BCIS (2019); and Council data

8 | A Deliverable Reality

West Horndon is a deliverable and achievable prospect, which will provide new homes and jobs in a sustainable location. There are limited landowners involved and the land is under the control of EASL. There is no additional land required in order to deliver the infrastructure.

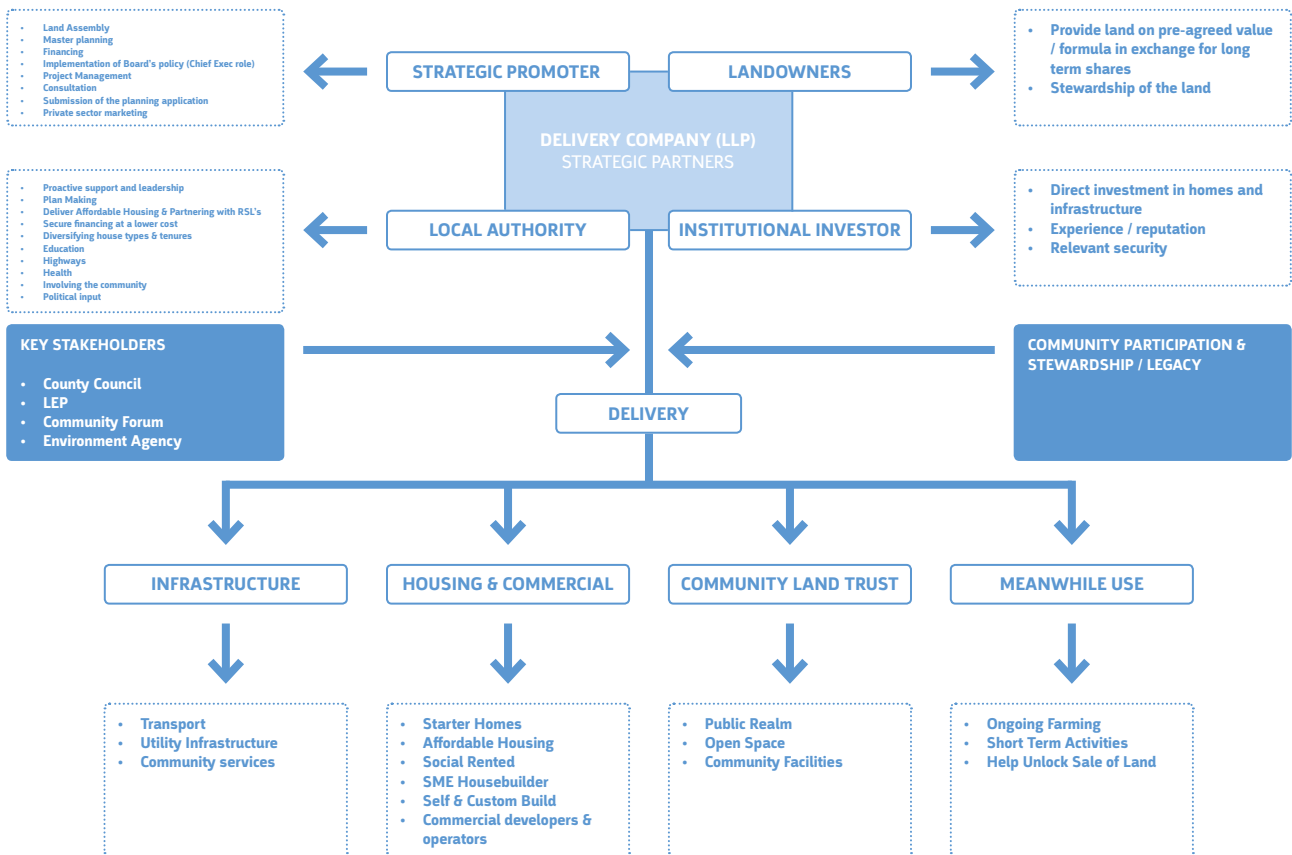
West Horndon will be of sufficient size to deliver planned infrastructure from the outset. The new primary and secondary school, revamped train station and bus interchange can all be delivered in the early phases without the need to risk vital community benefits including affordable housing.

West Horndon will unlock previously undervalued infrastructure connections, drive forward greater, varied, and economic growth for the region, whilst delivering a truly sustainable solution to Thurrock's housing needs.

EASL is currently investigating mechanisms for the delivery of a new settlement at West Horndon. In light of the Letwin Review EASL instructed Iceni to undertake a review of the best practice governance arrangements for existing new settlements and urban extensions within the UK. This research identified that the optimum model is a collaborative approach with cross partnership working between the landowner, the strategic promoter, the Local Authority and investment partners. EASL and their partners are keen with work with the key stakeholders to explore this model in further detail.

The unique nature of the delivery structure, as detailed below, will ensure that quality design across the development is delivered.

Delivery Model



8 | A Deliverable Reality

It is anticipated that delivery will start with a small number of outlets, delivering in the order of 100 units in the first year while the infrastructure is being rolled out. As a critical mass is built up at the new settlement, this will increase to annual delivery rates of 400 dwellings per annum. The significant and early investment in infrastructure will be critical in accelerating delivery rates. The delivery of a primary school and community facilities into the New Settlement early is critical to kick starting demand and delivery.

The development of a new settlement at West Horndon will involve a range of companies delivering a range of housing to achieve diversification in accordance with the recommendations of the Letwin Review including:

- Differing Tenures - Affordable homes; including affordable rented housing will be provided alongside affordable home ownership on each phase. Build to rent will also be delivered.
- House type and size – Within each phase a broad range of house types and sizes will be delivered.
- Housing for specified groups and custom build – older people's housing and plots sold for custom or self-build for individuals on Thurrock's self-build register will also be delivered. Student accommodation will also be explored.

Early delivery of community infrastructure to ensure a sense of community is fostered early and ensure the new settlement is sustainable and attractive for residents at the outset.

HEADLINE VIABILITY APPRAISAL

EASL has undertaken extensive feasibility assessments to test the viability of a new settlement at West Horndon.

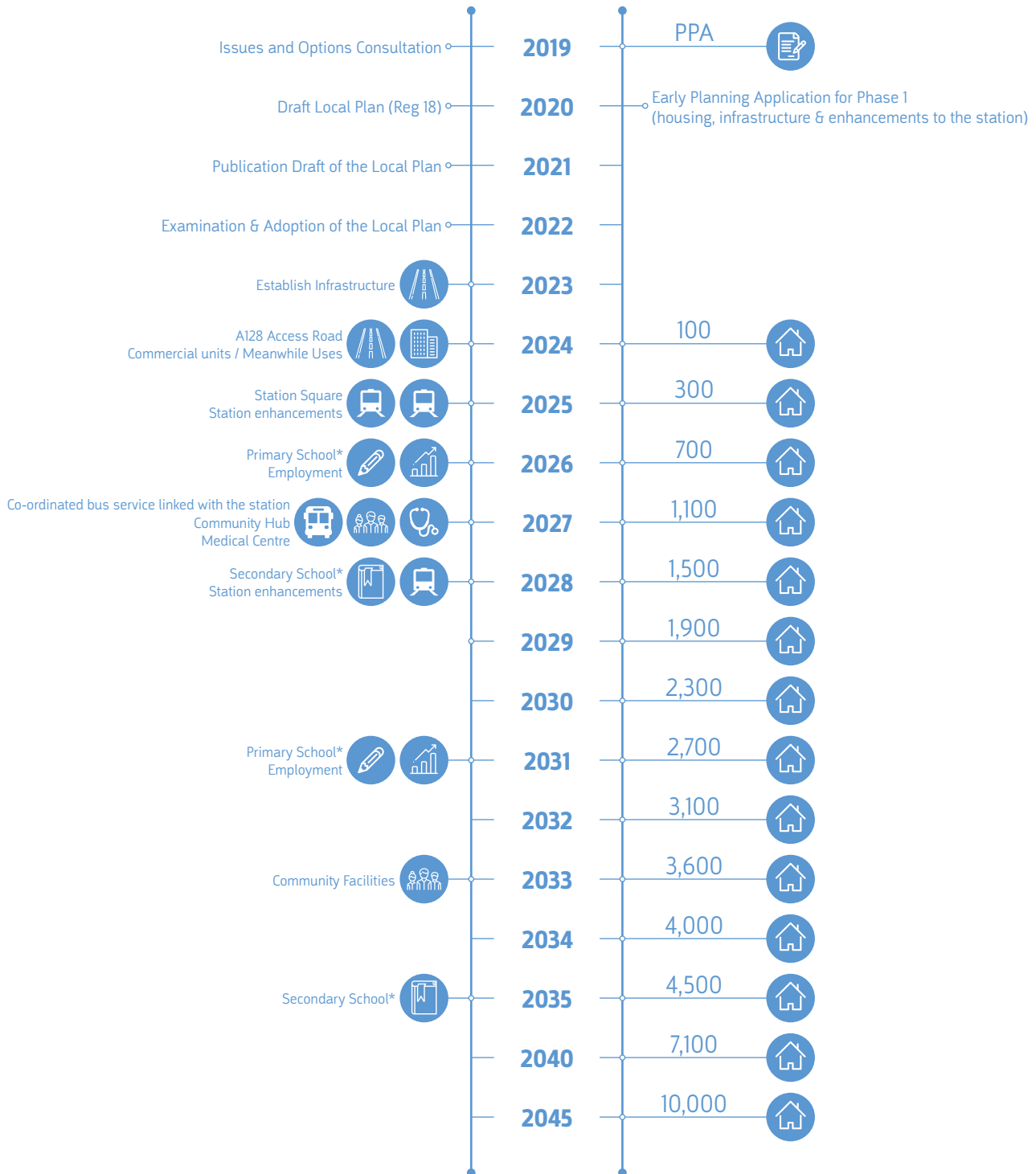
The proposals for the new settlement will deliver a significant scale of private sector investment. The list of infrastructure is detailed in the table below.

INFRASTRUCTURE	VALUE
Off site Infrastructure	
Roads	£15 million
Onsite Infrastructure	
Railway & Public Transport	£3.6 million
Travels Plans	£3 million
Utility reinforcement / distribution	£18 million
Road distribution network	£11 million
Public transport subsidy	£4.8 million
Community Facilities	
Open space & parks	£6.5 million
Education	£24 million
Commercial / community buildings	£20 million
Section 106	£120 million
Abnormal Costs	
Site Contouring	£5 million
Utility Diversions	£4 million

The investigations to date confirm that a New Settlement is a viable and deliverable prospect. It is key to the delivery of the project that the Delivery Model and governance arrangements are established in the early stages.

A timeline for the New Settlement is set out overleaf. A key element that will influence the trajectory for the New Settlement and assist in accelerating delivery is exploring the potential of an early planning application which delivers enhancements to the station, road infrastructure, education and enabling residential development.

8 | A Deliverable Reality



*primary and secondary schools are centrally and strategically located so delivery can come forward at any stage of the development to address local educational needs.

The anticipated delivery rates are based upon the unique characteristics of the site, including the benefits of the existing infrastructure



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