

26 November 2019

LC – 10/394  
BY EMAIL

Dear Sirs,

**REPRESENTATIONS TO ADDENDUM OF FOCUSED CHANGES – BRENTWOOD PRE-SUBMISSION LOCAL PLAN (REGULATION 19)**

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I write on behalf of my client, Estates and Agency Strategic Land (EASL), in relation to the aforementioned consultation. This submission follows previous representations we have submitted, most recently to the Pre-Submission Local Plan (Regulation 19) in March 2019.

EASL is promoting land west of Thorndon Avenue, West Horndon which constitutes the most sustainable undeveloped site in Brentwood Borough given its proximity to West Horndon railway station (one of just four 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. In fact, the evidence supports the allocation of this site, particularly to assist with housing delivery in the early years of the Plan period.

For information, EASL is also promoting land to the south of the railway line, which largely defines the existing community of West Horndon. This land, which lies within the administrative area of Thurrock, has been identified as a potential location for a new settlement in the Issues and Options Draft (Regulation 18) Thurrock Local Plan. EASL is therefore uniquely placed to contribute to the transformational change of land within the environs of West Horndon railway station, both to the benefit of Brentwood Borough and Thurrock.

**a. Introduction**

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These representations raise the following matters for consideration –

- The proposed modifications are further delaying the delivery of housing until later in the Plan period pushing out 70 dwellings from Years 7 – 9 to Years 15 – 17. While this is a modest number of homes it demonstrates the significant challenge the Council is facing in the delivery of housing in the early years of the Plan period;
- The SA accompanying the Consultation states that the Local Housing Need (LHN) figure has increased from 350 to 454 dwellings. The Consultation does not provide any evidence to demonstrate what this figure is based on, albeit it is closely related to the capped standardised method for the Borough of 452 dwellings. However, the PPG requires the Planning Authority to seek to meet the *uncapped* figure, which in the case of Brentwood would require the delivery of 469 dwellings per annum. Moreover, the Council has failed to consider the increased housing figure that will occur as a result of Crossrail's opening, which it is estimated will give rise to an additional need of 1,000 dwellings over the Plan Period;

- In terms of housing supply the Pre-Submission Plan is seeking to deliver just a 1% buffer on top of the minimum LHN of 454 dwellings. The Sustainability Appraisal accompanying the Consultation warns against this approach, stating that there is an over reliance on Dunton Hills Garden Village for housing delivery “*which leads to an increased degree of risk in respect of delays to delivery (the very reason why a buffer over-and-above the housing requirement is appropriate;*”
- The Focused Consultation demonstrates that it is imperative that the Council consider the allocation of additional sites. Land at West Horndon is available, suitable and deliverable and can contribute to meeting this shortfall. The land does not require any significant infrastructure and therefore can come forward in the early part of the Plan period to assist the Council in meeting its short to medium term housing needs.

## **b. Delay in Housing Delivery**

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The changes put forward by Brentwood Council primarily seek to address the projected reduction in developable capacity of four site allocations, equating to a reduction of some 70 units (Policy Allocations R18, R19, R25 and R26). The Council seek to offset this loss by allocating 70 additional units within the Dunton Hills Garden Village Strategic Allocation (Policy R01(l)).

We consider, not only are these changes unsound but that they also highlight and exacerbate the previous soundness concerns we had raised with the Local Plan by placing too much emphasis on Dunton Hills Garden Village (GC) to meet a large majority of the identified housing need in the Borough.

The Housing Trajectory set out at Appendix 1 of the Addendum document (proposed amendment 13) identifies that the 70-unit reduction across the four sites reduces supply across years (7 – 9) 2022/23 - 2024/25 of the Plan i.e. within the first 10 years of the plan period. However, the replacement of these units comes at the back end of the plan period through the Dunton Hills GC allocation; between 2030/31 – 2032/33 (years 15 – 17 of the plan).

We further note that there is an error in the ‘allocation total’ row on page 14 of the consultation document. The totals in rows ‘year 12’ and ‘year 13’ have been incorrectly increased by a total of 20 units whereas this increase should occur in row ‘year 17’ taking account of the numbers in the table above this.

We are concerned with the approach of delaying much needed housing to the latter years of the plan period as this approach is contrary to national policy. The National Planning Policy Framework 2019 (NPPF), at paragraph 67, requires that local plans should identify a sufficient supply of specific, deliverable sites for years one to five; and specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan. Therefore, the NPPF clearly advocates an approach of securing housing delivery in the early part of the plan period. If the Council were to consider that the available delivery from allocated sites were to reduce by 70 units within the Plan’s first 10-years, then in order to support soundness, the focus must be on replacing these units with the same initial 10-year period and not delaying this to years 15-17.

The rationale for the increase of 70 units at Dunton Hills GC is set out in paragraph 5 of the Addendum of Focused Changes document. This explains that the total capacity of the site is 4,000 units (with 2,500 units of these to be delivered within the plan period). As such bringing forward additional units within the period will require a faster rate of delivery. The Addendum of Focused Changes document does not however, provide any evidence of how these faster rates can be facilitated. The only reference to justifying the uplift is provided in the Sustainability Appraisal (SA) Report Addendum (October 2019), which states at paragraph 2.9.3: “*discussions between the Council and the site promoter have served to indicate that the 70 homes additionally assigned to the site through the Focussed Changes are deliverable within the plan period, and indeed can be delivered in a timely fashion such that the Local Plan housing delivery trajectory is unaffected*”.

No further information is provided as to where the additional units would fall within the phasing of the development and as such, we raise issue with the insufficient evidence to support this increase.

### c. Housing Requirement

In addition to the redistribution of 70 dwellings, the Sustainability Appraisal (SA) (October 2019) has confirmed that the Local Housing Need has increased to 454 dwellings per annum. The SA states that there are updates to the evidence-base since January 2019, including the new higher Local Housing Need (LHN) figure for Brentwood Borough, which is 454 dwellings per annum.

452 is the minimum figure identified in the Government standardised method, the starting point as it were for assessing the housing requirement for the Borough as detailed in Table 1 below. It is unclear whether the Local Planning Authority intend to amend the Pre-Submission Local Plan to take account of the revised LHN figure – this would appear to be a prerequisite since the housing need section, and specifically section 4.11 onwards, is predicated on a LHN figure of 350. The Local Plan needs to be updated to state that the 452 new households is the minimum LHN figure. Moreover, there does not appear to be any additional evidence supporting this consultation which justifies the LHN figure.

**Table 1: Brentwood Local Housing Need**

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

As detailed in the EASL representations on the Pre-Submission Plan (March 2019), the minimum local housing need figure is however influenced by a cap. The uncapped housing need for Brentwood is for 469 dpa (as shown in Table 1 above). Over the 17 year plan period this would equate to a need for 7,973 dwellings.

Para 2a-007-20190220 in the Planning Practice Guidance (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.”*

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.

Moreover, as detailed in full in our previous set of representations, the Council has failed to take into account the increased housing figure as a result of Crossrail’s opening, which it is estimated will give rise to a need of 1,000 dwellings over the Plan period.

Land at West Horndon is available, suitable and deliverable and can contribute to meeting this shortfall. The land 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 Pre-Submission Local Plan detailed the need to provide for a 'buffer' over-and-above LHN (identified in the Sustainability Appraisal as 454 dpa) in order to ensure a robust housing supply trajectory (recognising the risk of unanticipated delays to deliver at one or more sites). The Focused Changes confirms that the Council will not be providing a buffer and instead only to meet the minimum housing requirement. The housing supply is detailed further below.

#### d. Housing Supply

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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 capped standard method figure by less than 1%. Effectively it aligns with the minimum need figure.

The Council is also proposing to delay the delivery of housing in the early years with a stepped trajectory to provide 310 dpa to 2023 and a higher target of 584 homes per year thereafter. Totalling 7,752 units over the plan period 2016-2033 (paragraphs 1.16 - 1.21 of the Local Plan). For the reasons given we considered these figures should be treated as minimums as the actual (or full) level of housing need shown by the standard method is 7,973 dwellings. This is 220 dwellings above the housing requirement in the Plan which demonstrates that the Council need to allocate additional sites. As a result of the stepped trajectory and the increased LHN, the Local Plan will not meet the LHN figure of 454 until 2024.

All of the above seeks to further exacerbate the soundness issues we had previously raised regarding the Local Plan and its level of proposed housing delivery. Clearly, the reduction of 70 units from the first 10 years of the plan period further undermines its soundness.

#### e. Sustainability Appraisal of the Brentwood Local Plan

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The SA undertaken is critical of the proposed changes stating that it causes greater uncertainty. The Council's SA states at Para 9.9.11 that:

*"...to concentrate housing at DHGV to a greater extent, potentially leading to a degree of increased risk in respect of delivering the Borough-wide housing requirement, has uncertain negative implications for the achievement of 'Housing' objectives."*

The SA emphasises the proposed changes increases the level of uncertainty stating that –

*"On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.9.10) broadly holds true for the Pre-submission Plan plus Focussed Changes. **However, this conclusion is now associated with a greater degree of uncertainty.** First and foremost, this is on the basis that LHN, and therefore the annual housing requirement, is now understood to equate to 454 dpa, **such that the proposed supply figure of 456 dpa can no longer be said to put in place a significant 'buffer' over-and-above the housing requirement.** Secondly, the Focussed Changes will result in the housing supply being focused at DHGV to a greater extent, which leads to an increased degree of risk in respect of delays to delivery (the very reason why a buffer over-and-above the housing requirement is appropriate), albeit this risk is uncertain and may be marginal". (Our emphasis)*

The SA previously assessed a range of alternatives in order to deliver the Council's housing requirement. Given that the LHN figure has altered significantly, it is considered that a fresh assessment of the alternatives should be undertaken in order to ascertain whether a more proactive and positive strategy for accommodating housing growth in the Borough can be identified. The assessment of the alternative options on a LHN figure of 350 dwelling is now simply irrelevant.

In this regard, it is important to understand the respective merits of sites options through the SA process. For example, we have previously raised, in our representations to the Brentwood Local Plan Sustainability Appraisal (SA)(March 2019), that there were a number of identified effects within the SA we disagreed with. Our alternative assessment for West Horndon stated, with respect to air quality:

*“The spatial development strategy for the Brentwood Local Plan should seek to limit traffic through existing Air Quality Management Areas (AQMAs), which are primarily located along the A12 in proximity to Brentwood. From this perspective, development at West Horndon should be considered the preferred option. Growth in this location will be in proximity to an existing train station, thereby minimising the need for car travel, as well as resulting in improvements to the village centre to improve facilities for residents. As such, no significant negative effects in relation to air quality are anticipated.”*

We further consider that locating growth in inherently sustainable locations, such as at West Horndon, is important to consider in the context of wider air quality matters including, air quality management of the A127.

### **Proposed Modifications**

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In order to address the soundness issues we consider that the housing target should be reviewed with regard to the new evidence and that further sources of land supply should be identified, not only to deal with shortfalls over the plan period in total, but also specifically within its first 10 years.

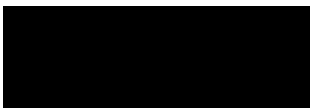
Land to the north of West Horndon railway station is available, suitable and deliverable and can contribute to meeting this shortfall. Importantly, it can come forward independently of the wider area of growth being promoted by EASL to the south of the settlement (in Thurrock Borough). The Brentwood Local Plan needs to seriously consider early delivery to ensure the Plan provides sufficient housing for Five Year Housing Land Supply, and for years 5 – 10.

Early delivery of West Horndon would assist DHGV coming forward as it would act as a catalyst for housing delivery in this area of Brentwood and enhance the attractiveness of DHGV from a purchaser's perspective. It would also help a Local Plan inspector determine that Brentwood's Local Plan is sound; as is self-evident from the present draft of the Local Plan that Brentwood's ability to meet its housing needs is inextricably linked with the release of Green Belt land, primarily at DHGV. The failure to adopt a local plan would not only result in Brentwood being unable to address its housing needs, it would deprive DHGV of the policy context in which to come forward as a planning application proposal, thereby exacerbating the deficit.

We had previously set out in the West Horndon Delivery Statement (Appendix 1 to our March 2019 representations) that the site could deliver first completions by 2024. This would mean that significant numbers of homes could be delivered within the first 5 - 10 years of the plan period helping to address the soundness issues identified.

We trust these representations clarify our position and that they are taken into consideration in the advancement of the Local Plan.

Yours faithfully,



Leona Hannify  
**DIRECTOR**