



**BRENTWOOD
BOROUGH COUNCIL**

Local Plan 2015-2030

Preferred Options

July 2013

COMMENT FORM

(For official use only)

Comment
No.

Ack. date

You can comment on the Local Plan 2015-2030 Preferred Options online at www.brentwood.gov.uk/localplan. Alternatively, please use this form to share your views on the contents of the Local Plan.

PERSONAL DETAILS

YOUR COMMENTS

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

Policy S2

Please specify if you Support or Object (tick as appropriate):

Support

Object

Comments (please use additional sheet if required):

Martin Grant Homes object to the proposition contained in Policy S2 that provision be made for the construction of 3,500 new dwellings in the period 2015-2030. When assessed across the Plan period as a whole, this implies an annual average rate of 233 completions. Such a rate of delivery is inappropriate when considered in the context of paragraph 2.30 of the Preferred Options which states that *“a figure of somewhere between 331 and 362 homes a year would represent objectively assessed need for the Borough.”*

The National Planning Practice Guidance draft launched by DCLG for testing on 28th August 2013 states that the assessment of development needs is an objective evaluation of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development or environmental constraints. However, these aspects will need to be addressed when bringing evidence bases together to identify specific policies within development plans. We do not consider that the Preferred Options for Consultation, or the published evidence base, demonstrates why there are specific constraints which militate against the accommodation of the objectively assessed housing need briefly described at paragraph 2.30 of the Preferred Options.

Martin Grant Homes note the reference at paragraph 2.30 of the Preferred Options to the study carried out on behalf of the Council by Peter Brett Associates. However, the Council’s website does not contain that report and it is unhelpful/inappropriate for the Preferred Options for Consultation to be published without that important element of the evidence base.

The National Planning Practice Guidance launched for testing by DCLG on 28th August 2013 notes that household projections published by DCLG “*should provide the starting point estimate of overall housing need.*” The 2011-based interim household projections describe an increase of 3,165 households in the Borough in the period 2011-2021. If that rate of change were to arise in the period 2015-2030, 4,750 households would form during the Plan period. This represents an average increase of 316 households per year. The Preferred Options for Consultation does not provide the necessary information to establish the extent to which the Council has fully considered the implications of the most recent household projections which are expected to provide the starting point estimate of overall housing need.

The National Planning Practice Guidance notes that the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under-delivery of housing. As household projections do not reflect unmet housing need, local planning authorities are expected to take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply. Without the appropriate evidence base, it is difficult for Martin Grant Homes to establish whether the Council has undertaken the anticipated technical analysis. In such circumstances, we can only conclude that the evaluation of future housing requirements is unsound.

Paragraph 158 of the NPPF requires local planning authorities to ensure that their assessment of strategies for housing takes full account of relevant market and economic signals. Page 137 of the Preferred Options contains information regarding the cost of housing in the Borough. This overview of local market/economic signals demonstrates the extent to which there is an inadequate supply of new housing in the Borough. Paragraph 4.100 of the Preferred Options observes that “*a growing number of households in the Borough cannot afford to buy or rent on the open market. House prices in Brentwood are among the highest in Essex.*” Furthermore, paragraph 2.35 of the Preferred Options also indicates the consequences arising when the objectively assessed housing needs for the area are not being met.

Martin Grant Homes consider that the Council has failed to justify its position that the Local Plan 2015-2030 will not provide a policy framework to accommodate the objectively assessed housing requirement arising in the Borough in the period to 2030. It is clear from the content of paragraphs 2.20, 2.32 and 3.2 of the Preferred Options that the Council is proceeding with the Local Plan on the basis that, with the exception of West Horndon, there will be no consideration given to a review of the present extent of the boundary of the green belt. We consider that this is inappropriate when viewed in the context of the objectively assessed housing need figure contained at paragraph 2.30 of the Preferred Options. The necessary/appropriate studies are not part of the evidence base supporting the Preferred Options consultation. In these circumstances, Martin Grant Homes maintain that the Council has failed to justify its position and that the housing provision figure proposed at Policy S2 is inappropriate/inadequate/unsound.

Page 19 of the Preferred Options refers to the “*overwhelming*” feedback from respondents indicating a “*desire to protect the Green Belt.*” It appears to Martin Grant Homes that this feedback has led the Council to inject a level of constraint into the assessment of objectively assessed housing needs that runs contrary to the advice set out in the National Planning Practice Guidance launched for testing on 28th August 2013. At paragraph 2.20 of the Preferred Options, the Council refers to “*significant capacity constraints*” which indicate that “*it is not possible to accommodate fully the scale of growth implied.*” Again, the appropriate/necessary reports do not form part of the evidence base published with the Preferred Options for Consultation. In the light of the objectively assessed housing need, it is important/necessary for the Council to undertake a comprehensive green belt review in order to identify potential development locations and assess appropriate mitigation measures.

The Preferred Options for Consultation makes no reference to joint working as encouraged by paragraph 179 of the NPPF. Consequently, there is no analysis of how the Council intends to seek to make provision for its unmet dwelling requirement in areas beyond the Borough boundary. Martin Grant Homes are not aware of the ability of neighbouring local authorities to make any provision for Brentwood's unmet housing needs. Paragraph 181 of the NPPF states that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when local plans are submitted for examination. This process is not described in the Preferred Options for Consultation and, accordingly, Martin Grant Homes do not consider that the evolution of the Local Plan 2015-2030 accords with the test of soundness established at paragraph 182 of the NPPF.

The National Planning Practice Guidance launched for testing by CLG on 28th August 2013 maintains that the household projections produced by DCLG are statistically robust and based on nationally consistent assumptions. However, the Guidance notes that plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence. The Preferred Options for Consultation does not contain such an evaluation and, in the circumstances, the evolution of the Local Plan in this form must be considered to be inappropriate/unsound.

As noted above, paragraph 2.30 of the Preferred Options observes that a figure of somewhere between 331 and 362 dwelling completions a year would represent the objectively assessed need for the Borough. Martin Grant Homes are aware that two scenarios contained within the Greater Essex Demographic Forecasts Phase 4 (Edge Analytics – January 2013) suggest a dwelling requirement at the upper end of the range described at paragraph 2.30 of the Preferred Options. Furthermore, the economic scenario described in the Greater Essex Demographic Forecasts Phase 4 is higher than the provision set out at Policy S2 of the Preferred Options for Consultations. When all the relevant information is taken fully into account, Martin Grant Homes conclude that the amount of housing suggested at Policy S2 is inadequate to address the objectively assessed need arising in the Borough in the period to 2030. The intention to produce a Local Plan which fails to meet those future needs will merely exacerbate the affordability issues described at paragraphs 2.20, 2.32 and 3.2 of the Preferred Options for Consultation.

In these circumstances, Policy S2 needs to be substantially reconsidered in order to ensure that the Local Plan 2015-2030 addresses the Borough's objectively assessed housing need arising in the period to 2030. As presently worded, Policy S2 indicates that provision will be made for the construction of 3,500 new dwellings in the Plan period. However, as noted above, the continuation of the CLG 2011-interim household projections across the totality of the Plan period would require the construction of at least 4,750 dwellings in the period 2015-2030. Furthermore, the objectively assessed need described at paragraph 2.30 of the Preferred Options would necessitate the construction of 4,965-5,430 dwellings in the Plan period. When seen in the context of these assessments, Policy S2 is clearly inappropriate/inadequate/unsound.

Please return to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed form and email planning.policy@brentwood.gov.uk

Please note that all responses will be published online. More information can be found at www.brentwood.gov.uk/localplan

All responses should be received by Wednesday 2nd October 2013