



**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 (Amount and Distribution of Residential Development 2015 – 2030)

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

Support

Object

Comments (please use additional sheet if required):

Please see attached submission made for an on behalf of Barwood Land and Estates Ltd.

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

Brentwood Local Development Plan: Preferred Options Consultation July 2013

Representation on Behalf of Barwood Land and Estates Ltd

The comments on this section of the Local Plan should be read together with all other responses submitted on behalf of Barwood Land and Estates Ltd (Barwood Land).

The draft Local Plan fails to provide an adequate justification as to why it is failing to plan to deliver Brentwood's full objectively assessed housing needs through policy S2.

There is no evidence presented in the Plan to demonstrate why a capacity constraint-led approach is the most appropriate strategy given the level of housing needs identified; or how the Borough has fulfilled the Duty to Co-Operate in order to ensure the delivery of unmet needs in adjoining local authority areas (which will similarly be affected by Green Belt issues and the lack of Brownfield sites).

The Objectively Assessed Need Report referenced in the Local Plan (produced by PBA) was not published alongside the Preferred Options consultation. It is assumed however that this is a robust, evidence based, authoritative analysis of local housing requirements. It is not clear why this critical report was not made available in the public consultation period, particularly as this appears to be where the Alternative Option 1 figures of 4,960 to 5,600 dwellings (331 to 373 home a year) have been derived from.

Alternative Option 1, based on the PBA Report is at odds with Brentwood's Preferred Option in policy S2 of 3,500 dwellings (200 homes a year 2015-2020; 250 homes a year 2020-2030), some 1,460 to 2,100 below the full objectively assessed housing need figure. This is a significant under-supply that fails to meet the requirements of the Framework (paragraph 47) to "boost significantly the supply of housing".

The housing delivery trajectory (Figure 2.2 of the Plan) uses the proposed housing figure of 3,500 dwellings. This shows a shortfall in projected completions (2014 - 2017) against the identified annual requirement (including past/projected completions) and as against the Average Annual Housing Provision target (200 - 250 units per annum). There is a further shortfall in the period 2018/19 - 2024/25.

The housing trajectory is therefore back-loaded, with an increasing reliance on delivery from later years of the Plan Period. This is contrary to the Framework that seeks to significantly boost the supply of new housing now.

There is also an over-reliance in the housing supply on assumed delivery from the West Horndon major allocation, with inadequate provision made in the draft Local Plan for flexibility and contingency in housing delivery from other sites.

The starting point should be that Brentwood meets its full objectively assessed housing need. In doing so, there is a need for greater flexibility and contingency through the identification of sites capable of sustainable development to meet housing needs. A thorough and careful assessment process based on meeting the SHLAA criteria (suitable, available and achievable) is necessary in order to provide the basis for the Plan to achieve this. Honeypot Lane (site reference 022 in the Supporting Document: Draft Site Assessment, July 2013) is a site that fulfils the SHLAA criteria, and should be included in the housing trajectory and allocated in the Local Plan accordingly.