



**Town Planning**

Submitted to  
Brentwood Borough Council

Submitted by  
AECOM  
6-8 Greencoat Place  
Victoria, London  
SW1P 1PL  
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AECOM on behalf of Crest  
Nicholson

Brentwood Strategic Growth  
Options Consultation

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# 1 Introduction

Thank you for the opportunity to comment on Brentwood's Strategic Growth Options consultation. The representations provided below are made on behalf of Crest Nicholson. We have also relied upon the supporting interim Sustainability Appraisal (SA) Report (January 2015) in drafting these representations.

## 1.1 Background

### *Summary of Brentwood's Local Plan position*

Brentwood Borough Council is required to plan for the needs of the borough. In order to do so, it is necessary that an up-to-date development plan is in place. We support the Council's Strategic Growth Options consultation document, aim of which is to set out the options being considered to meet future development needs so that the Council can positively plan for the next 15-20 years.

The Council last consulted on the Local Plan in 2013. The document set out the long term vision for how the Council proposed the borough should develop by 2030 and the draft strategy and policies for achieving that vision. An Interim SA Report was published alongside.

The Preferred Options consultation document received extensive representations, and it subsequently became apparent that the policy approach to addressing a number of key issues needed to be reconsidered, including:

- Objectively assessed housing need (which has increased by 2,000 to 5,500 new homes in the borough over the next 15 years);
- Employment land and job provision;
- Supporting the growth of Basildon;
- Opportunities associated with Crossrail;
- Renewable energy / sustainability policy; and
- Gypsy and Travellers' accommodation.

Brentwood's Strategic Growth Options consultation has been produced to respond to these issues.

## 2 Brentwood's Strategic Growth Options Consultation

### 2.1 Brentwood's Strategic Growth Options

We welcome the publication of the Strategic Growth Options for Brentwood and support the approach taken to inform a spatial plan for the borough over the next plan period. Our representations below set out our reasons for supporting this approach. We have structured our response in line with the strategic objectives and themes as set out in the consultation document and the Preferred Options Core Strategy (2013) and have also relied upon the supporting interim Sustainability Appraisal (SA) Report (January 2015).

### 2.2 Managing Growth

The Local Plan will need to set out a spatial strategy for where development of all kinds will be located. The vision, strategic objectives and planning policies within the Plan will all be underpinned by the spatial strategy. Brentwood consulted on four spatial options in 2009 and a preferred spatial option in 2013 (which was derived from the options in 2009). The proposed spatial strategy in 2013 was essentially based on the lack of capacity in the Brentwood urban area and north of the borough in terms of infrastructure such as roads, primary schools, health facilities and a higher landscape value. The A127 Corridor presents an opportunity to improve the capacity of the above, as well as create a sustainable community in the south of the borough and in neighbouring Basildon. As a result of changes since 2013, the level of growth required is now higher, specifically the need to meet objectively assessed housing need. For this reason alone, we consider there is merit for the whole borough to accommodate varying amounts of this growth, with a significant amount of housing and employment focused along the A127 Corridor.

Furthermore, the concept of a garden suburb at Dunton which directs development growth to the existing urban areas of Laindon/Basildon is well served by existing and proposed services and facilities.

### 2.3 Sustainable Communities – Brentwood's Five Year Housing Land Supply

Brentwood's updated housing evidence suggests an objectively assessed housing need of 360 homes per year. The previous target was 150 homes per year. Currently, existing brownfield land can accommodate up to 2,500 new homes. This is the amount that could be sustainably developed on available brownfield land. In order to deliver the projected 5,500 new homes, the Council will need to consider the release of Green Belt.

The Council has an overall amount of identifiable and deliverable housing land supply for 1,632 homes over the next five years. That is 269 homes fewer than the calculated five year requirement. This equates to a housing land supply of 4.29 years. The required additional 5% buffer as set out in the NPPF is included within the calculated five year requirement.

The paper concludes that the borough cannot demonstrate a five year deliverable supply of housing land. In accordance with the NPPF it is recognised local authorities should have a forward looking approach to the five year housing supply. The Council will review its five year housing supply position when April 2014 residential land monitoring data becomes available.

The proposed Growth Options have been considered to allow for all areas of the borough to accommodate the most appropriate amount of growth having regard to their characteristics and existing capacity in terms of transport and community infrastructure. There is merit to delivering the planned growth with a major focus along the A127 Corridor and in neighbouring Basildon. Directing growth in this part of the borough will significantly contribute towards meeting the housing needs, as well as meeting the growth needs in neighbouring Basildon, creating inclusive, balanced, sustainable communities. Furthermore, focusing a higher % of growth in the A127 Corridor presents an opportunity to deliver a strategic mixed use allocation at West

Horndon or cross boundary development at Dunton. Development along this corridor could provide potential funding for improvements to capacity along the A127.

Directing growth along the A127 Corridor will deliver better outcomes, most notably in terms of economic and employment objectives. This will help deal with the overall unmet employment need. This approach also complements the approach taken by Basildon in their Revised Preferred Options Core Strategy in that they are also focusing employment and housing along the A127 Corridor (namely draft allocation PADC 5, West of Basildon).

Via Basildon's Local Plan process, Crest is committed to working with Basildon Council on the delivery of PADC5 West of Basildon. This allocation has the potential to deliver up to 2,300 new homes, new employment opportunities and associated supporting infrastructure. The boundary of PADC5 goes right up to the borough boundary with Brentwood, and Crest has significant landholdings within this area. From our discussions with Basildon Council, and the fact that the highway and infrastructure network is the most advanced in the borough, it is more likely and realistic for development to come forward in the west of Basildon Borough first. This represents a positive and important element to the successful development of PADC 5, as well as the successful delivery of housing and employment growth in Brentwood.

Development along this corridor could provide potential funding for improvements to capacity along the A127. It is also important to note that development is not likely to have similar negative impacts on infrastructure and services as at the A12 Corridor Housing Site Options.

## 2.4 Economic Prosperity

Brentwood has an unmet employment need for new employment land. This is partly due to an increase in housing which creates the need for new jobs. Whilst we recognise that Brentwood has the lowest level of unemployment within Essex, there is still the requirement to accommodate this unmet need. The majority of new employment land could be provided along the A127 Corridor. Although it would create additional demands on infrastructure and services, this could be mitigated by funding for improvements.

The 2013 Preferred Options proposed the Brentwood Enterprise Park as an opportunity to provide a new business park for the borough. This would meet the majority of the unmet employment need. Alternative sites would not meet this unmet need together. Furthermore, the strategic mixed-use allocation south of the A127 corridor (Dunton) could include some new employment land which would also meet this unmet need.

Due to their proximity to the M25, focusing much of the growth along the A127 Corridor would also facilitate employment growth. It is correct to say that this would also likely contribute to the economy of Basildon (PADC 5) given transport links. Another consideration is the effect that growth in the south of the borough would have on Thames Gateway regeneration objectives.

Given the level of change since 2013 and the fact that the level of growth required is now higher, specifically the need to meet full housing need, it is likely that growth options may be limited in the A12 Corridor of Brentwood and Shenfield, including Brook Street, Hutton, Pilgrims Hatch, Warley and Mountnessing.

## 2.5 Environmental Protection and Enhancement

Any housing provision over 2,500 homes within Brentwood will need to consider the use of Green Belt. This is the amount that could be sustainably developed on available brownfield land. There are also other development needs, such as employment.

The Council has commissioned a study to identify objective housing need for the borough, which concludes a requirement to provide for around 360 new homes per year. The previous target in the East of England Plan was 175 homes per year. Over 15 years that comes to around 5,500 homes, some 3,000 more than what can be provided from brownfield sites in urban areas. The shortfall from previous years will also need to be taken into account in the future Plan period, which will increase the overall housing need figure.

We welcome the Council's review of the Green Belt to accommodate future development to meet housing and employment needs. As such, we believe development coming forward along the A127 Corridor and at PADC 5 can be 'feathered' into the

wider landscape, creating an attractive environment for those living in the area, as well as providing a more visually coherent and defensible boundary for the extended urban area. For these reasons, we would disagree with the findings of the interim SA Report (January 2015) which states that west of Basildon performs poorly on landscape issues and that part of the 'area has low relative capacity to accommodate development without adverse landscape impacts'.

The collection of villages and attractive natural landscapes provides limited potential for significant growth in Brentwood over the life of the Local Plan. Furthermore, transport connections and local facilities are not as good in this part of the borough and so we would agree with the Council that it would not be sustainable to locate significant growth in this area.

We support the Council's intention to look at the release of Green Belt to realise some of their housing need, because without it, there is limited capacity in meeting the planned housing and employment growth. Notwithstanding this, we consider that development coming forward in Brentwood has the ability to consider the aims and objectives, visual appearance and character of the Green Belt and not have a negative impact on its openness. In fact, we consider the scale of development envisaged offers a significant opportunity to deliver enhanced ecological and habitat provision in a strategic, structured manner.

## 2.6 Quality of Life and Community Infrastructure

New development must not place additional pressure on existing community infrastructure, and new infrastructure must be planned to accommodate new development. The Council will need to secure additional provision where deficiencies are identified.

In light of the requirement to meet full housing need, Essex County Council have identified a significant deficit of primary school places in Brentwood Borough by 2017/18 and the remaining schools in the area will be close to capacity or slightly over capacity by 2017/18. In response to new development, new primary school(s) will be needed along with the remodelling and expansion of education and childcare facilities to meet local need.

The consultation paper recognises the need for additional services to support growth across all options. Again, it is considered that focusing growth along the A127 Corridor has the capacity to deliver new community infrastructure and by working jointly with Basildon Council and the ability to bring forward new infrastructure as part of PADC 5, sustainable development should be achieved.

The interim SA Report also reinforces the benefits associated with focusing more growth along the A127 Corridor;

*Options providing larger more highly concentrated development offer greater potential to provide new community infrastructure for residents (funded through developer contributions) and in this regard **Options 1, 2 3 and 4** perform similarly.*

***Option 1 (Dunton)** would also be likely to deliver positive health implications through more sustainable travel patterns, minimising adverse air quality impacts and encouraging active travel.*

Directing growth with a major focus at Basildon also performs well in terms of community and well-being considerations given relatively good accessibility to community infrastructure for residents of new communities and the potential for large scale growth to help with addressing 'relative deprivation' issues where they exist.

## 2.7 Duty to Cooperate

Local authorities are required to cooperate on strategic planning matters. The Council has been working and will continue to work with its neighbours on cross boundary issues. This commitment to joint working is demonstrated via the recent signing of a Memorandum of Understanding with Basildon Borough Council on the concept of a Dunton Garden Suburb.

We welcome the commitment of both Basildon and Brentwood Council's working together on meeting their objectively assessed housing needs and employment requirements. We look forward to working with both Councils and other stakeholders on the next stages of their respective plans, and most importantly, the delivery of significant growth along the A127 Corridor.

### 3 Conclusions

Whilst the development of Brentwood's Core Strategy is still at an early stage, we consider it appropriate that a larger % of the future growth is accommodated in the A127 Corridor with a smaller % in the centre of the borough at Brentwood/Shenfield, and a minimum % in the north of the borough, reflecting the characteristics of each growth area and the availability of the necessary infrastructure and services and facilities to accommodate this planned growth. We consider that the area along the A127 Corridor and in neighbouring Basildon will respond to the issues identified by the Council, e.g. meeting housing and employment needs, phasing, Green Belt and landscape capacity.

With regards to existing infrastructure, transport connections, local facilities, landscape value growth options for the north of the borough are not largely sustainable to locate significant growth in the area.

Given its location and availability of existing infrastructure and scope for improvements compared to allocations in the A12 Corridor, the fact that suitable sites are ready for development now (PADC 5), the Council can be confident that the A127 Corridor spatial option will make a major contribution to the future development needs of the borough, as well as neighbouring Basildon's development needs. Focusing growth here should also recognise, respect and draw from its landscape setting, the surrounding remaining Green Belt and its position as a gateway to both Councils.

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Address: 6-8 Greencoat Place , London SW1P 1PL  
Phone number +44 (0)20 7798 5000