

Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

17 February 2015

Our Ref: 10/394
BY POST/EMAIL

Dear Sir/ Madam,

BRENTWOOD BOROUGH COUNCIL – STRATEGIC GROWTH OPTIONS CONSULTATION

We are writing on behalf of EA Strategic Land LLP (EA Strategic) in response to the consultation on the Brentwood Local Plan Strategic Growth Options (SGO). EA Strategic has an interest in land in West Horndon, and is working with neighbouring landowners and local stakeholders to bring forward a sustainable urban extension, incorporating a mix of uses including housing, community, health and employment uses, through the plan-making process.

a. Background

We understand that the requirement for the current consultation has arisen as the Local Plan Preferred Options (LPPO) did not provide sufficient development land to meet the objectively assessed needs (OAN) of the Borough.

The LPPO sought to identify sufficient land to accommodate a minimum of 3,500 dwellings (at a rate of 200 per annum for the first five years, then 250 per annum thereafter) and 5,400 additional jobs (at a rate of 285 per annum) in Policies S2 and S3. The SGO uses as its base the assumption that the Council needs to plan for the provision of a minimum of 5,500 dwellings (360 per annum).

In simple terms, this means that the next iteration of the plan will need to find sufficient sites to accommodate a minimum of 2,000 additional dwellings to that provided for in the LPPO. Significantly, paragraph 1.4 of the SGO confirms that the capacity of brownfield sites in urban areas is 2,500, meaning that sites sufficient to accommodate a minimum of 3,000 dwellings must be identified within the Green Belt.

These representations will consider, in outline terms, whether the housing targets identified in the SGO are: i. sufficient to meet needs; ii. set over a realistic plan period; iii. proposed to be accommodated in the most sustainable location; and iv. seek to maximise the opportunities presented by the duty-to-cooperate (DTC). Furthermore, these representations will confirm why the Council was correct when it identified the West Horndon Strategic Growth Location (WHSGL) (comprising land under the control of EA Strategic, Hermes and Threadneedle) as the most sustainable site to accommodate a minimum of 1,500 dwellings and a range of other community and commercial uses in the LPPO and why it remains the most sustainable and deliverable option for future growth in the Borough.

b. The Spatial Strategy

Paragraph 2.11 of the SGO notes that the level of growth, especially for housing, is now higher than that identified in the LPPO. It goes on to note that the spatial strategy identified in the LPPO may not now be the most sustainable option to accommodate the higher level of growth. For the reasons set out in these representations, EA Strategic considers the WHSGL is the most sustainable and deliverable site within Brentwood to accommodate the future growth requirements of Brentwood. However, there remains scope to enhance the sustainability of the WHSGL by its extension to include land to the south of the settlement (within Thurrock) as part of a wider opportunity.

Paragraph 2.9 provides a useful summary of the preferred spatial strategy identified in the LPPO, being the focus of growth in Brentwood, Shenfield and West Horndon. This spatial strategy was a variation on the 'transport corridor-led growth' option contained within the 2009 Issues and Options Consultation to reflect the comparative capacity for growth at West Horndon when compared to Ingatestone, a settlement which the Council identified as being heavily constrained by capacity and infrastructure.

The West Horndon Strategic Growth Location follows the principle of the Opportunity Area identified in Policy CP4 of the LPPO. The land was identified as a preferred option due accessibility to rail and transport infrastructure, accessibility to a range of local shops and community facilities as well as its potential to improve public realm, the ability to provide green space and strengthen the village centre. The benefits of West Horndon remain and the relevant evidence base documents continue to confirm that West Horndon is the most sustainable location for focusing future growth to meet the needs of Brentwood.

Furthermore, it is significant that, inter alia:

- Paragraph 3.7 of the LPPO confirmed that *"Having good road and rail access, local shops and community facilities, 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"*.
- Policy S1 b. of the LPPO confirmed that the sites identified to accommodate growth in the LPPO '...will have no significant impact on the Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood-risk, air and water pollution.' This reflected the findings of the Sustainability Appraisal for the LPPO which determined that the spatial strategy in the LPPO, which included the provision of 1,500 dwellings in West Horndon (500 of which would be located on brownfield land and 1,000 of which would be located on the EA Strategic land), was the most sustainable and deliverable.
- There is no evidence to suggest that the spatial strategy contained within the LPPO, refined as it was from the Issues and Options consultation, is no longer the most sustainable and deliverable option for accommodating the future growth needs of Brentwood. Indeed, the requirement to provide for a greater level of growth should result in the determination to maximise the opportunities presented by West Horndon as a strategic growth location, including the opportunities presented by land to the south of the settlement.

c. Strategic Matters

There are a number of strategic matters that are identified in the SGO that are relevant to the determination of the most sustainable and deliverable options for the future development of the Borough.

The principal matter that is raised in the SGO is the extent of the housing needs arising in the Borough. We will return to consider some further detailed matters relating to the OAN below, but in simple terms it is the responsibility of the Council to identify its OAN and plan to meet it. The NPPF (paragraph 182) requires that any Plan submitted to the Secretary of State for Examination must be

capable of being found both legally compliant and sound. This places various duties on the Council, including, but not limited to ensuring the Plan is:

- Positively prepared – seeking to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and is consistent with achieving sustainable development;
- Justified – the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence;
- Effective – deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

In the interests of ensuring the next iteration of the draft Local Plan is capable of addressing the above, EA Strategic has sought legal advice and other technical input on the content of the SGO and the parallel consultation on the Dunton Garden Suburb (DGS).

The review of planning, legal and technical matters confirms that the LPPO preferred option of the WHSGL is indeed the most sustainable and deliverable option. This is supported by the evidence base prepared by the Council and the Sustainability Appraisal of the SGO. Copies of these assessments can be provided to assist the Council in the progression of its plan-making functions.

Furthermore, it has determined that the sustainability of the WHSGL can be further enhanced through the identification of further land to the south of the settlement for development. Indeed, in the interests of discharging its duties under the DTC, EA Strategic urges the Council to consider the opportunities presented by development south of the settlement and the benefits it can deliver.

Life of the Plan

The LPPO was published in 2013 and proposed to cover the minimum plan period of 15 years, assuming adoption in 2015, giving a plan-period of 2015-2030. As a consequence of the current consultations (SGO and DGS) it is likely that a delay will be experienced in the adoption of the subsequent Local Plan. EA Strategic considers that a more realistic date for adoption of the Local Plan would be no earlier than 2016/17.

As a result the plan should seek to cover the period should run until at least 2031/32, and the Council may wish to consider extending this further in order to ensure additional required growth can be delivered. It may be prudent to prepare the plan to cover the period 2015-2035, thereby allowing for delays in the adoption process and ensuring the plan will cover a minimum of 15 years at the point of adoption. By planning for a longer plan period from the outset, the Council will protect itself from needing to make changes to the plan period later in the process of plan preparation and will reduce the risk of any subsequent adoption being predicated on an immediate plan review.

Duty to Cooperate

Paragraph 1.17 and 1.18 of the SGO indicate that the Council has been working with neighbouring authorities in the preparation of its plan. Local planning authorities have a duty to co-operate on strategic planning issues that cross administrative boundaries. The purpose of the duty to co-operate is to ensure strategic priorities are properly co-ordinated and clearly reflected in Local Plans. The failure to demonstrate compliance with the duty to co-operate would render the plan incapable of being found legally compliant. We note that objections were received to the LPPO from the neighbouring authorities of Basildon, Chelmsford and Thurrock. As the LPPO did not propose to meet all of the Council's housing need, we understand that each authority confirmed that it would not accept any of the shortfall. The result of this is that Bentwood would need to seek to accommodate all of its required growth within the Borough boundary.

Furthermore, the Greater London Authority (GLA) has confirmed that growth in London is anticipated to increase from currently planned levels (32,000 homes per annum). London's projected housing need is expected to reach between 49,000 and 62,000 homes per annum. As a consequence of this high level of need, the GLA wrote to authorities within commutable distance of London to confirm that the 42,000 units per annum proposed in its Further Alterations to the London Plan (FALP) still results in a significant shortfall that will need to be met by LPAs outside London. It stands as reason that areas, such as Brentwood, have a potential role to play in accommodating London's growth.

Although the FALP Inspector found the evidence basis for the plan sound, he also had concerns that the anticipated shortfall could not be met in the capital. Consequently, the Inspector expressed that "new, innovative and possibly unpopular solutions" will be required to meet London's housing requirements, insinuating that in pursuing a long term strategy for the Capital's growth, potential land release outside of London will need to be explored, within areas in easy reach of London. These areas could include Brentwood, which is well located to provide for overspill due to its location, its excellent rail links and the quality of the facilities and services that it offers.

Evidence base

EA Strategic supports the intention of the Council to prepare a Plan consistent with national policy and guidance and supported by technical evidence which ensures the plan is prepared in a positive manner. We note there are a number of documents 'forthcoming' as part of the evidence base (Green Infrastructure Study; Landscape Capacity Study; Housing Viability Study; Objectively Assessed Housing Need; Crossrail Economic Impact; Highways Modelling; Open Space Study; Sports Strategy; and Renewable Energy Study), and wish to highlight the importance of publishing evidence base documents early in the plan production process to allow them to be reviewed alongside the emerging plan.

An up-to-date evidence base should provide a sound basis for the plan and consultation on its content will help to ensure local communities and other interested parties are aware of the issues considered by the Council in the preparation of a Local Plan. The consideration of different options to meet needs should be developed using up to date studies to reflect the most recent information available.

Strategic Housing Market Assessment

The draft Strategic Housing Market Assessment (SHMA) for Brentwood was published in July 2014 alongside each of the constituent authorities within the Heart of Essex (HoE) Housing Market Area (HMA). Paragraph 1.13 of the SGO confirms that the SHMA forms part of the housing and demographic evidence base for the Local Plan and we understand the document has informed the forthcoming Objectively Assessed Needs (OAN) Report.

We previously wrote to the Council in September 2014 in order to draw attention to our concerns with the SHMA, in particular noting that the document is not compliant with the requirements of the NPPF or NPPG. These concerns noted that a fundamental flaw of the SHMA was that it is cast in the mould of a pre-NPPF SHMA and focused predominantly on affordable housing needs for the Borough. As the OAN is yet to be determined, noting that the conclusions of the recent 'Objectively Assessed Housing Needs for Brentwood – Moving towards a Housing Target' report are open to criticism for a number of reasons pertaining to compliance with the relevant guidance, it is necessary to reiterate these concerns, which are set out in the attached letter.

These concerns go to the heart of soundness of the plan and have the potential to have a significant impact on the Local Plan programme.

Sustainability Appraisal

A Sustainability Appraisal (SA) was prepared to inform the LPPO (2013) which concluded that the growth option that focused development primarily at Brentwood, Shenfield and West Horndon was the most preferable. West Horndon is identified as being relatively unconstrained Green Belt land that would perform particularly well in terms of community and well-being and economy and employment. An Interim Sustainability Appraisal (ISA) January 2015 has been produced with the intention of informing the strategic growth options consultation and subsequent preparation of the

Draft 'Proposed Submission' Plan. The following key topics are the focus of the Sustainability Appraisal: Air Quality; Biodiversity; Climate change mitigation; Community and well-being; Cultural Heritage; Economy and employment; Flooding; Housing; Landscape; Soil and contamination; Waste; and Water quality and water resources. We note that the SA Report (as opposed to the *Interim SA Report*) will be published alongside the Proposed Submission Plan.

In summary, the ISA determines that the West Horndon SGL is ranked the most sustainable growth option overall. Furthermore, it ranks as the most sustainable option in terms of Economy and Employment, Housing, and Soil and Contamination. The findings of the report in relation to West Horndon and the Dunton Garden Suburb proposals are discussed in further detail in Section e. and f. of this letter.

d. Housing need

As previously noted, the SGO consultation is being carried out on the basis that the LPPO did not seek to identify sufficient land to meet the full OAN for market and affordable housing in the housing market area. Whilst the Council is yet to publish its OAN report, the SGO consultation document indicates that 'evidence suggests' a need of around 360 new homes per year or 5,500 over a 15 year period.

Planning Practice Guidance (PPG) (paragraph 2a-019-201-40306) recognises that various factors may require some adjustment to be made to demographically-modelled household projections (e.g. affordable housing needs, employment issues and market signals). It is significant that the evidence base for the SGO includes the Essex Planning Officers Association (EPOA) Phase 6 Housing and Population Projections, as the data contained within it was recently considered by an Inspector in advance of the Examination of the Uttlesford Local Plan (ULP). The ULP Inspector, in his summarised conclusions after the hearing sessions, wrote to Uttlesford Council to confirm that a number of relevant factors meant an uplift of at least 10% from the SNPP-2012 annual average dwelling requirement (using the average between the 2008 and 2011 based household formation rates) would be a reasonable and proportionate increase in the OAN to reflect the affordability factors and accord with the tenor of the NPPG. The range of factors relevant to this conclusion, including the market signals, affordability issues and homelessness are set out in further detail in paragraphs 1.4-1.10 of the Inspectors letter (a copy of which is appended for ease of reference). The Inspector then went on to consider the economic factors and migration in paragraphs 1.11-1.12. A copy of the Inspector's letter is enclosed.

It is significant that the factors affecting Uttlesford are similar to those affecting Brentwood, yet the manner in which they affect Brentwood are more severe in each case. the consequence of which, is such that the application of this rationale to the SNPP-2012 scenario of the EPOA Phase 6 the average of 340 dwellings per annum requirement would rise to 374 dwellings per annum (10% uplift added).

However, whilst in Inspector in the ULP determined that the proposed 10% uplift from the OAN would not 'hinder economic aspirations', the figures for the economic model forecasts in the EPOA Phase 6 for Brentwood confirm that the application of the 'Jobs' and 'Employed People' scenarios would provide an OAN of approximately 425 dwellings per annum (using the average between the 2008 and 2011 based household formation rates). Applying the logic of the ULP Inspector to these figures in line with the NPPG, it would be appropriate for Brentwood to plan for an OAN of between 374 and 425 dwellings per annum. This equates to a total of 5,610 – 6,375 over the plan period (15 years from 2015-2030).

Were these figures set over a more realistic plan period, noting that paragraph 3.3 of the Strategic Growth Options consultation document suggests a possible alternative plan period of 20 years, they would result in an increased housing target based on the OAN range of between 7,480 and 8,500 dwellings in the plan period.

Options for Accommodating Needs

On the basis that the Council needs to prepare a plan for a minimum of 5,500 homes over the plan-period, potentially rising to 8,500, it is important that all of the options are fully and soundly assessed. Paragraph 1.4 of the SGO confirms that the maximum capacity of the urban brownfield sites (including the West Horndon Industrial Estate) is 2,500 dwellings. As such, the plan needs to provide sufficient land to accommodate a minimum of 3,000 homes (potentially rising to 6,000) on greenfield sites.

It is noted that the SGO for West Horndon is presented as an alternative to Dunton Garden Suburb (DGS), providing the basis for promoting one option over the other. In the context of the above, it may be that it is necessary to assume that both options are required as a minimum. On the basis that 1,500 dwellings are proposed at the WHSGL, of which 500 of the 2,500 brownfield homes are accommodated on the West Horndon Industrial Estate, and 1,000 are accommodated on the land controlled by EA Strategic, this would still leave a requirement for a minimum of a further 2,000 homes on greenfield sites in the Borough. Whilst the most sustainable location for this additional growth would be around the settlement of West Horndon, noting its sustainability credentials identified by the Council, including access to the existing railway station, it is important that all of the options to accommodate this additional housing are assessed.

Affordable Housing

The need for affordable housing in Brentwood is significant. The draft SHMA confirms this and presents a comprehensive assessment of affordable housing needs.

The draft SHMA concludes that the total annual newly arising need to be 321 dwellings per annum. Table 14.10 goes on to identify the total net current need to be 718. Allowing for stock turnover and provision to meet a current backlog over a five year or a twenty year period (taking account of total affordable housing stock available), the findings of the draft SHMA confirm that Brentwood has a total affordable housing need of between 330 and 234 per annum.

EA Strategic supports the intentions of the Council to provide sufficient land to accommodate affordable housing needs. In the context of the established level of need, it will be necessary to consider increasing housing provision targets in order to achieve this. The Council will be aware of the risks of providing insufficient sites to accommodate affordable housing needs, both in terms of the assessment of housing under paragraph 49 of the NPPF (see Sims Metal UK (South West) Limited, Long Marston, Pebworth – appeal ref. APP/H1840/A/13/2202364) and in terms of the social, environmental and economic implications of under-provision.

e. Strategic Growth Options (Consultation Question 3)

The Council has identified three broad growth areas in the SGO consultation document, namely: (A) North of the Borough (allowing villages to grow); (B) A12 corridor; and (C) the A127 corridor. The LPPO proposed to focus development on the latter, with particular growth proposed in West Horndon.

EA Strategic has commissioned a review of the Interim Sustainability Appraisal, the outcome of which shall be submitted shortly in response to the consultation that is currently underway.

For the reasons set out within these representations and in the context of the review of the Interim Sustainability Appraisal, it is clear that the LPPO preferred option of a West Horndon Opportunity Area (Policy CP4) continues to be the most sustainable approach to accommodating the required growth. The rationale for this is summarised below:

- Option A lacks the necessary infrastructure to cope with the level of growth required, both in terms of the appropriate investment in infrastructure where it is needed to provide the necessary levels of transport connectivity and access to local services. Furthermore, developments on smaller sites in the locations identified in Option A would be less likely to be capable of delivering viable mixed use development. This would therefore not be a sustainable option for the delivery

of the Borough's required growth and pursuit of Option A would act to exacerbate unsustainable transport and migration patterns.

- Option B is constrained by the difficulty of providing increased capacity on the A12 junctions with significant problems already being experienced by local congestion, as well as flooding and foul water capacity issues in areas such as Ingatstone. Furthermore, the landscape character in this location has been assessed by the Council as being of greater value than the southern parts of the Borough, restricting the ability to release sufficient Green Belt land for development.
- Option C has greater capacity as the landscape character is of less significance, there is more scope to improve the transport capacity in this location, and can deliver sufficient growth to enable the Council to better meet its needs.

Having established that Option C remains the most sustainable option for accommodating growth, we turn to consider the 2 sub-options set out in paragraph 3.12 of the SGO consultation below. These comprise the newly identified DGS option and the previously identified WHSGL.

f. West Horndon and Dunton Garden Suburb (Consultation Question 4)

The evidence base for the LPPO and the SGO confirms that the WHSGL is the most sustainable and deliverable option for the future growth of the Borough. The potential of the DGS in comparison is compromised by a number of significant factors.

To summarise, the WHSGL is capable of being brought forward for development quickly, thereby allowing for the delivery of the much needed housing and employment development. Furthermore, as it includes a significant proportion of brownfield land, which would form the natural first phase of development, it is capable of being brought forward in advance of the plan. It also provides the opportunity to meet the needs of the local community, deliver significant benefits to the local community and maximising the efficiency of investment in existing infrastructure.

In comparison, any proposals for the DGS will take a significant period to come to fruition, as the DGS consultation document recognises (noting the concern below that the anticipated delivery timescales are optimistic at best); includes limited brownfield land; will require significant investment in new infrastructure, meaning that any strategic infrastructure can only realistically be provided at a late stage in the development process (meaning travel patterns will have been established); has not been subject to community engagement, or other capacity or technical analysis; and requires cross-boundary collaboration and alignment of Plans.

We examine the key matters further below.

Deliverability

The NPPF is clear in requiring local planning authorities to identify sites which are deliverable (paragraph 47), and in order to be deliverable they should be available, offer a suitable location for development, and be achievable (footnote 11).

The land at West Horndon is available now. It has the support of landowners and has been actively promoted at all stages of the Local Plan process. Contrary to this the landholdings associated with DGS did not feature in the SHLAA (2011). Therefore it appears that no interested parties are actively promoting the land, and there is some uncertainty as to whether the landowners are supportive of the process. The landholdings at West Horndon have a history of engagement through the plan process and benefit from an existing draft allocation, to meet an already identified housing need. Furthermore, growth at West Horndon has already been subject to significant community engagement which will continue throughout the development process.

West Horndon is also a suitable location for development. As identified by the LPPO, West Horndon has good road and rail access, existing local shops, existing employment opportunities and existing community facilities. It also provides opportunities to improve the settlement by diverting HGVs away from the centre, enhance the vitality and viability of the existing town centre shops and services,

thereby strengthening the centre of West Horndon. It is significant to note that CPRE in its response to the LPPO agreed with this assessment of the suitability of West Horndon, and went as far as saying that in its opinion “it will not be possible for anyone to identify superior candidate site(s) as judged by the necessary criteria”.

If the DGS option is progressed in isolation it would have the contrary effect on the existing businesses and services in West Horndon. It is likely new facilities would be provided in DGS at the expense of those that could be assisted by new growth in West Horndon.

In terms of achievability, taking account of the level of housing required immediately in the Borough and in the wider area, we have some concerns with the ability for DGS to deliver housing in the timescales necessary. The EA Strategic land at West Horndon has the ability to:

- Deliver much needed new housing early in the Plan process. It consists of opportunities that could proceed in advance of a development plan allocation in the form brownfield-led redevelopment of the tired and out-dated industrial estates;
- Provide compensatory provision for business tenants in the larger allocation ensuring employers' requirements to be close to existing customers and access to the excellent road network are not lost; and
- Ensure new development is sustainable through the phased delivery of infrastructure improvements to ensure the growth can be accommodated.

We have identified previously in representations to the LPPO that the landholdings at West Horndon are available, suitable and deliverable and would enable the Council to more readily meet its housing need. In comparison, the proposals at DGS are Greenfield-led and require the Council to ‘start from scratch’ on the supporting infrastructure from the outset.

Furthermore, the details provided in the separate consultation related to DGS state that “If approved, any development is likely to take a minimum of 8 years before anything would happen on site”. We consider this to be conservative in the context of other examples of major strategic developments such as Beaulieu Park in Chelmsford, where no homes have yet been constructed despite the proposals having been identified over approximately 15 years ago and the formal planning process having starting in 2007. It is worth noting that the phasing plan for Beaulieu Park in Chelmsford anticipates delivery of the site will take a minimum of 15-20 years. In this context, any proposals for the DGS are likely to take longer, as Beaulieu Park is in a single local authority area, is not in the Green Belt, and was the subject of an Area Action Plan (AAP). It is therefore considered unrealistic that the delivery of this quantum of housing and the associated transport and community infrastructure required would be unlikely to deliver sufficient growth within the plan-period.

In addition, there is existing infrastructure in West Horndon that could be used more efficiently than it is currently, and improved as more homes are delivered in phases. This could be done up front, without the need for public funding. In comparison, the DGS option would require public funding to deliver a new railway station, if indeed the network operator is willing to provide a new railway station.

Indeed, the inclusion of a new railway station as part of the DGS is far from certain as no allowance for a new station at DGS has been made in the recently agreed franchise agreement with C2C. This would have significant implications for the successful delivery of DGS. If no new station is provided, but DGS is progressed with, then it would most likely result in significant vehicle movements to West Horndon, for the use of the station there, which could not be considered sustainable development. Furthermore, if a new station is provided in DGS, then it is unlikely it would be able to co-exist with that at West Horndon. The infrastructure present at West Horndon could be enhanced to allow for even greater growth in this location, negating the need for the proposals at DGS. It also provides tangible opportunities for cross-border collaboration with the adjacent land to the south in Thurrock, in order for more growth to be accommodated in this sustainable location, in close proximity to the town centre and train station.

It is important to note that the separate DGS consultation document has been developed on the premise that it is in close proximity to existing bus routes throughout the neighbouring area of Laindon and West Horndon, railway stations at Laindon and West Horndon, and existing services and facilities including retail, schools and healthcare at Laindon and West Horndon (page 5 of the DGS Consultation). This strongly suggests that it would be more sustainable to deliver the growth needed in those areas identified as already hosting the required facilities, such as West Horndon.

DGS Land Capacity

In order to establish the extent of housing capacity of the proposed DGS, EA Strategic has commissioned an assessment of the appropriate densities of the development area identified in the DGS consultation document. This assessment has been prepared in order to establish a more accurate picture of the extent of land required to accommodate 4,000-6,000 homes and the associated density assumptions.

This assessment has shown that assuming all the areas identified in the DGS consultation document are available for development are built-on, the Basildon portion of the site could accommodate somewhere close to the 2,300 homes anticipated in the Basildon Local Plan Preferred Options, at a density of c. 30dph. The DGS land within Brentwood could accommodate the remaining 1,700 homes at a density of circa 25-28dph. This basis capacity assessment does not allow for the provision of land to accommodate the necessary educational facilities, including at least 2 primary schools and a secondary school, in accordance with Essex County Council's Education Contribution Guidelines Supplement. Further land would also be required to deliver the employment opportunities through provision of new commercial / industrial land, new gypsy and traveller pitches, community facilities or any potential new railway station. The provision of land for these facilities would have significant potential to reduce the overall land available for residential development.

In terms of the ability of the development area identified for DGS to provide the upper end of the range (6,000 homes), this would require a far greater land take (extending to the A128) in order to be achievable at a reasonable density of development (up to 30dph). Again, the provision of the necessary associated services and facilities would accentuate this further, resulting in severe encroachment into the countryside, and risking coalescence of settlements.

Notwithstanding this, assuming a maximum of 4,000 homes was achievable in DGS, and that 1,700 of them were to meet Brentwood's housing need, this would still leave the Council some way short of the required minimum of 3,000 homes in the Green Belt. It is considered misleading that the DGS consultation document claims to be able to deliver 4,000-6,000 homes in this location, and nevertheless further development in more sustainable locations such as West Horndon would still be required to address Brentwood's needs. In short, West Horndon is the most sustainable and deliverable preferable option as it is more sustainable than DGS, and it may be that DGS is also required to more fully address the Council's housing need.

Sustainability Appraisal

The Interim Sustainability Appraisal (SA) of the SGO has been prepared in order to assess the five identified alternative locations for strategic scale development, and this is subject to a separate consultation process.

This assesses the sustainability credentials of West Horndon as well as DGS and whilst we disagree with the assessment undertaken, and have responded appropriately to the consultation under separate cover, it nevertheless concludes that West Horndon is the most sustainable location overall, and most notably is ranked higher or equal to DGS in terms of biodiversity, cultural heritage, economy and employment, flooding, housing, landscape and soil and contamination (7 out of the 10 topic areas assessed). Significantly, DGS is identified as having the potential to lead to significant negative effects on the Green Belt, rural character, and the countryside, with low capacity to accommodate growth. However, we are particularly concerned with the assessment's ranking of DGS above West Horndon in terms of community and well-being, air quality and climate change mitigation.

The SA makes the fundamental assumption that DGS will have a new railway station, when it is understood that this is not necessarily the case. This could have a significant effect on the ranking of DGS for both climate change mitigation and air quality. The location of growth around West Horndon would focus development around existing transport infrastructure with capacity to expand, and local services and facilities reducing the need to travel far afield. The option of enhancing existing infrastructure in West Horndon seems to be disregarded by the SA, which instead concludes that DGS would have the greatest potential to offset the increase in car travel locally by supporting more sustainable patterns of travel. This conclusion is reached without explanation, and it is not clear how this could have been reached given the presence of existing employment and transport infrastructure at West Horndon.

With regards to community and well-being, the SA suggests that both West Horndon and DGS (amongst others) perform similarly in the context of being larger more concentrated development, offering greater potential to provide new community infrastructure. However, there is no explanation as to why West Horndon then scores significantly lower in this topic area. It is important that this is clarified and that the SA is revised appropriately.

It is also important to note that Basildon's Revised Preferred Options SA Report (2013) describes the land now known as DGS as PADC 5 (West Basildon Urban Extension). It considers that it would be likely to have a *"significant effect on conserving and enhancing the diverse natural and urban landscape, countryside and green spaces"* and concludes that *"overall a mixed range of scores are given to the SA objectives which reflects the fact that the PADC is separated from existing services / facilities by existing transport and rail infrastructure which could act as a barrier to new residents and the policy does not include a range of new services and facilities considered to be in keeping with the scale of development"*. This reinforces the concern that the area earmarked for DGS is not suitable for the scale of development now proposed by DGS.

Further details are included in our representations submitted to the SA consultation under separate cover.

g. Green Belt Assessment (Consultation Question 4)

The Council has identified the need to remove land from the Green Belt (GB) in order to accommodate the housing it requires during the life of the plan. It has yet to prepare a Green Belt Assessment or an assessment of the landscape in Brentwood. As a result there is little evidence to assist with determining the sequentially preferable location for Green Belt release for the purposes of housing and economic development in Brentwood.

Nevertheless, paragraph 80 of the NPPF outlines the five purposes of the Green Belt:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This section provides an assessment of the extent to which the land at West Horndon and DGS meet the objectives (or otherwise) of the GB as set out in the NPPF. These are assessed in turn below:

West Horndon (WH)	DGS
<i>1. to check the unrestricted sprawl of large built-up areas</i>	
<ul style="list-style-type: none"> - WH is not a large built up area; - Allocation defined by strong defensible boundaries formed by A127 and Childerditch Lane; and - Roads present recognisable permanent physical features to ensure boundary would not need to be altered during plan-period. 	<ul style="list-style-type: none"> - DGS is on the edge of the large built up area of Laindon, which is itself part of the wider conurbation of Basildon; and - The DGS diagram included in the separate consultation document illustrates the extent of the urban sprawl that would result from this option, with development stretching beyond any permanent physical features and out into the open countryside.
<i>2. to prevent neighbouring towns merging into one another</i>	
<ul style="list-style-type: none"> - The nearest settlements are Laindon to the east (2 miles) and Upminster (2.5 miles) and South Ockendon (3.5 miles) to the west and south west, providing significant opportunity for growth of WH, particularly to the west and south; and - As such the development of the WH allocation would not risk any coalescence of towns. 	<ul style="list-style-type: none"> - The development at DGS would result in the edge of Laindon moving ever nearer the edge of the WH; and - The closing of the distance between the settlements and the lack of defensible boundaries to DGS would result in a real risk of the settlements merging in the long-term.
<i>3. to assist in safeguarding the countryside from encroachment</i>	
<ul style="list-style-type: none"> - Land around WH is countryside; however, there is a clear and identified need to identify suitable sites within the countryside to accommodate Brentwood's growth needs; - This area of the countryside is considered to be the least sensitive to change in the Borough, as per the Landscape Assessment undertaken by the Council for the Local Plan evidence base in 2006; and - The SA produced for the SGO also identifies WH as having the most capacity to accommodate development. 	<ul style="list-style-type: none"> - The entirety of DGS is located within the countryside; - This area of countryside is considered by the SA to have low capacity to accommodate development; - The SA also highlights that this option could lead to significant negative effects on the GB, rural character and the countryside; and - The Basildon SA (2013) also highlights that development in this location could have "significant negative effects" on the natural landscape, countryside and green spaces.
<i>4. to preserve the setting and special character of historic towns</i>	
<ul style="list-style-type: none"> - WH is not in or adjacent to any Conservation Areas, and has no Listed Buildings or other heritage assets of significance in the settlement; and - Nearest heritage designation is Thorndon Country Park, which would not be affected by the growth of WH. 	<ul style="list-style-type: none"> - This option has the potential to impact the settings of 2 nearby listed buildings (Dunton Hall and Dunton Hills); and - Thorndon Country Park is also in close proximity to DGS.
<i>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i>	
<ul style="list-style-type: none"> - The growth of WH would facilitate the recycling of tired and out-dated industrial estate; and - It would assist urban regeneration through the brownfield-led housing development and compensatory employment provision. 	<ul style="list-style-type: none"> - There is no potential to utilise existing brownfield land in the GB with this option; and - It would be likely to have a negative effect on urban regeneration resulting in the closure of local businesses in WH when new businesses are created in DGS, increasing the amount of derelict land elsewhere.

The above assessment confirms the position established in Policy S1 of the LPPO which confirms that the allocation of the EA Strategic landholding at West Horndon would have no significant impact on the GB. The WHSGL performs a limited function in the Green Belt and is therefore considered to

be the least harmful area of the Green Belt in which to accommodate new development in the Borough.

In comparison, the DGS plays an important role in the Green Belt, fulfilling the majority of the five purposes set out in the NPPF.

h. Conclusion

In summary, these representations and the legal and technical advice that has underpinned them, confirm that the WHSGL is the most sustainable and deliverable site to accommodate the future growth needs of the Borough. They also note the importance of the evidence base (including the SHMA, SHLAA and other requirements) in preparing a sound plan, critically assess the potential extent of the OAN, undertake a capacity assessment of the DGS and critically assess the WHSGL and DGS in terms of the Green Belt functions.

They establish that the effect of current guidance on the identification of OAN and the consequential housing targets that arise mean that the figure of a minimum of 5,500 dwellings over the plan period is considered to be the minimum required to meet needs. Allowing for market signals, affordable housing pressure and economic factors the figure is likely to rise further. Moreover, if the plan period is extended to allow for the plan to cover a minimum of 15 years from the date of adoption, the figure will rise further still.

They also identify an opportunity to maximise the development options at the WHSGL through collaboration with Thurrock under the DTC.

They establish that, whilst the proposed growth at DGS is a laudable aim for the long-term, it will not address current needs. On the contrary, if the DGS is pursued as an alternative to the previous preferred options it is likely to result in significant damage to the environment and social and economic factors, including the landscape, the purposes of the Green Belt, travel patterns and economic growth.

Thank you once again for the opportunity to respond to the Strategic Growth Options consultation. We would be very grateful for confirmation that these representations have been received and confirm that we would like to be involved in future stages of the Local Plan process.

In particular, we would like to register our interest in appearing at the Examination of the plan at the appropriate time.

Yours sincerely

A solid black rectangular box used to redact the signature of David Churchill.

David Churchill
DIRECTOR