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# BRENTWOOD BOROUGH LOCAL PLAN STRATEGIC GROWTH OPTIONS CONSULTATION

RESPONSE TO PUBLIC CONSULTATION

ON BEHALF OF

CROUDACE STRATEGIC

February 2015

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<b>Project Reference:</b>	18845
<b>Status:</b>	FINAL
<b>Issue/Revision:</b>	01
<b>Date:</b>	17 February 2015
<b>Prepared By:</b>	Heather Allen
<b>Checked By:</b>	Huw Edwards
<b>Authorised By:</b>	Huw Edwards

Barton Willmore LLP  
The Observatory  
Southfleet Road  
Ebbsfleet  
Dartford  
Kent  
DA10 0DF

Tel: 01322 374660

Ref: 18845/A5/HA/mg

Date: 17 February 2014

E-mail: [heather.allen@bartonwillmore.co.uk](mailto:heather.allen@bartonwillmore.co.uk)

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## 1.0 INTRODUCTION

### (i) Purpose of These Representations

1.1 This Statement has been prepared on behalf of Croudace Strategic and sets out comments in response to Brentwood Borough Council's (BBC) Strategic Growth Options Consultation (SGOC, January 2015). Alongside the SGOC, BBC is also consulting on the 'Dunton Garden Suburb Consultation' (DGSC, January 2015). This is a joint consultation with Basildon Borough Council and is considered relevant to the SGOC.

1.2 Croudace Strategic has a controlling land interest in a site known as "Officers Meadow", Chelmsford Road, Shenfield (hereafter referred to as 'the Site'). Notwithstanding our Client's specific land interest, these representations have been prepared in objective terms and in the light of the prevailing planning policy framework – in particular the Government's guidance set out in the National Planning Policy Framework (NPPF) (March 2012) and National Planning Policy Guidance (PPG) (March 2014).

### ii) Purpose of the SGOC

1.3 The SGOC document (para 1.10) advises that, following consultation on the Preferred Options Local Plan (POLP, July 2013), several issues need to be reconsidered:

- **Objectively Assessed Housing Need**- the need to increase the proposed housing target in line with the requirements of National Policy;
- **Crossrail**- the need for additional evidence on the economic impacts arising from the arrival of Cross rail and other related impacts;
- **Dunton Garden Suburb**- Basildon Borough Council's proposals for a strategic allocation in Dunton up to BBC's boundary;
- **Sustainability**- Renewable Energy policies to be renewed;
- **Planning for Gypsies and Travellers**- a new assessment for all Essex authorities has been produced.

1.4 BBC is therefore consulting on areas for potential growth and specific sites across the Borough to inform the emerging Local Plan. The document includes all "site options" put forward/promoted for development in previous stages of the emerging Local Plan.

1.5 Whilst the consultation is welcomed, it should be recognised that the majority of Evidence Base documents which will inform the emerging Local Plan (as listed at Para 1.13 of the

SGOC) are still “forthcoming”. Without the availability of such evidence, the extent to which respondents can take an informed view on where future growth should be located is limited. The same applies to BBC in progressing to the next stage of the Local Plan.

### iii) National Policy and Housing Need

- 1.6 The NPPF provides a ‘Presumption in favour of Sustainable Development’ (Para 14). Accordingly, Para 47 requires Local Planning Authorities (LPAs) to use their evidence base to ensure that their Local Plan meets the full, ‘Objectively Assessed Needs’ (OAN) for market and affordable housing in the housing market area, as far as is consistent with the Policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.
- 1.7 LPAs must plan for a mix of housing that *“meets housing and population projections, taking account of migration and demographic change”* (Para 159). Significant weight should also be placed on the need to support economic growth through the planning system (Para 19).
- 1.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

**Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.**

*(Reference ID: 2a-015-20140306)*

- 1.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

**The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.**

*(Reference ID: 2a-015-2014-0306)*

### iv) National Policy and the Green Belt

- 1.10 It is recognised that the ‘Presumption in favour of Sustainable Development’ (NPPF, Para 14) does not apply to development within the Green Belt, which covers a large proportion of the Brentwood Borough.

1.11 Section 9 of the NPPF considers the protection of Green Belt land, in that its fundamental aim is to prevent urban sprawl by keeping land permanently open in order to maintain the essential Green Belt character of openness and their permanence. The NPPF (Para 80) states that the Green Belt is intended to serve five purposes:

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

1.12 Paragraph 83 of the NPPF states that Green Belt boundaries, once established, should only be altered in exceptional circumstances, through the preparation or review of Local Plans. LPA's should take account of the need to promote sustainable patterns of development and should consider channelling development towards urban areas, towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (Para 84).

1.13 The above is supported by the PPG (March 2014).

#### **v) National Policy and Plan Making**

1.14 Para 182 NPPF requires that, *'A local planning authority should submit a plan for examination which it considers is "sound" – namely that is:*

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

1.15 Paragraph 156 of the NPPF states that LPAs should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.16 Paragraph 157 states that crucially, Local Plans should be drawn up over an appropriate timescale, preferably a 15-year time horizon, take account of longer term requirements and be kept up to date.

**vi) Content of Representations**

1.17 The SGOC has been assessed on the basis of the above National Policies. In summary, these representations set out the following comments:

- Whilst we support the increased housing target included within the SGOC, BBC has not identified its full OAN in accordance with the requirements of the NPPF and PPG;
- We support BBC's conclusion that Greenfield/Green Belt sites, along with brownfield sites, will be required in order to meet BBC's increasing housing target;
- We are concerned that BBC's current conclusions on "Broad Areas" of growth are not supported by a sufficient evidence base, with the majority of documents still being prepared;
- However, BBC's future growth strategy is likely to require a range of sites from each of the "Broad Areas" identified. This should include Shenfield, and the Site, both of which are identified as being suitable to accommodate future sustainable growth.

## 2.0 PROPOSED HOUSING TARGET

### (i) Proposed Housing Targets

- 2.1 BBC's previous POLP (July 2013) proposed a housing target of 3,500 dwellings to be built in the Borough across the Plan period (2015-2030), with an annual delivery rate of 200 dwellings per annum (dpa) during 2015-2020, rising to 250dpa during 2020-2030.
- 2.2 The POLP also included an "alternative housing requirement" of between 331 to 362 homes per year, based on an assessment of OAN undertaken by Peter Brett Associates (PBA). This approach was rejected due to concerns about Green Belt release, congestion in Brentwood Town Centre, limited infrastructure capacity and impact on the rural character of the Borough. Our previous representations raised concerns with this approach, notably that the reduced housing target was not 'justified' by any sufficient robust evidence which demonstrated the Borough was constrained for the reasons set out above.
- 2.3 In response to objections to the POLP (including from neighbouring authorities), recent Planning Inspectorate decisions on other Local Plan Examinations, and the NPPF requirement for plans to be "positively prepared" and supported by technical evidence, BBC has revisited its position.
- 2.4 Notably, since the POLP consultation, an updated PBA OAN assessment (December 2014) has been issued, and the proposed housing target increased to 362 dpa. It should be noted that whilst PBA's updated assessment is dated December 2014, the report was not in fact made publically available until February 2015 (see issue date and footer), part way through the SGOC. We therefore reserve the right to comment further on the assessment should this be necessary.

### (ii) Population Projections/Formation Rates

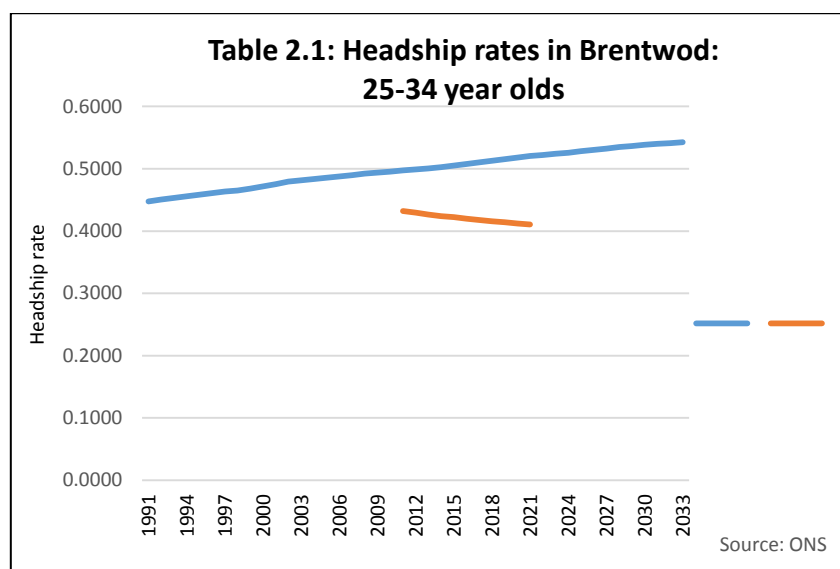
- 2.5 The PBA assessment concludes that OAN for Brentwood is 360 dpa, to incorporate demographic and economic led need, and to respond to market signals.
- 2.6 The demographic 'starting point' in assessing OAN is concluded by PBA as being within a range of 333 to 347 dpa. Although the 2012-based CLG household projections (released 26 February 2015) are likely to show growth in households' closer to the lower figure (333), this will be due to the new projections being underpinned by recessionary trends in household formation. DCLG confirm this, and that the projection will provide a good 'initial indication'



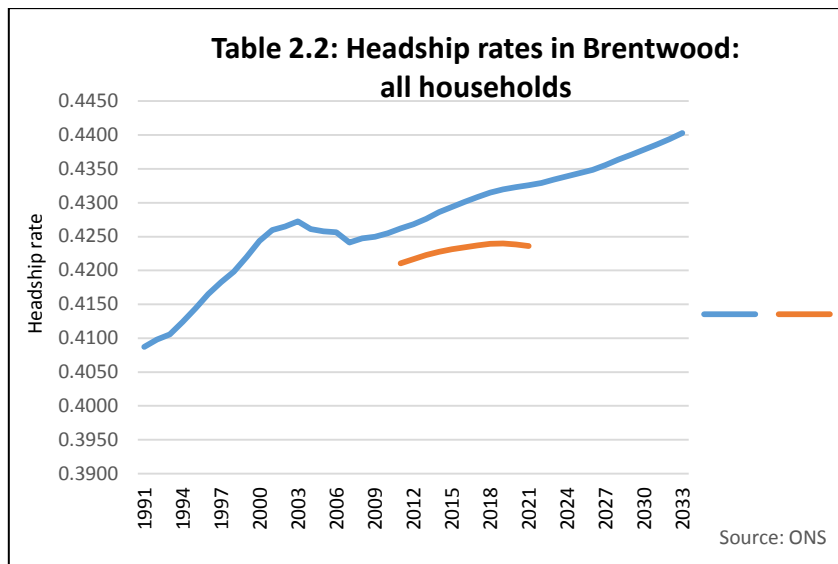
of likely household growth, in preparation for the release of the 2012-based projections, as follows:

**“The same methodology is being used as for the 2011-based projections. This means that the ONS 2012-based population projections (already published at local authority level) provide a good initial indication of likely household growth to feed into local authorities’ assessments of housing requirements.”<sup>1</sup> (Our emphasis)**

- 2.7 The recessionary trend in household growth projected by the interim 2011-based DCLG household projection (and expected in the 2012-based projection) is particularly noticeable in the younger age groups (25-34 and 35-44) across the country when compared to the previous 2008-based CLG projections, and has been created by a significant increase in younger people living at home, in turn created by the worsening affordability of housing. The 2008-based CLG projection is compared with the 2011-based projection in Tables 2.1 (25-34 age group) and 2.2 (all ages) below:



<sup>1</sup> 2012-based Household Projections for local authorities in England to be published in February 2015, DCLG, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/388308/household\\_projections\\_note\\_for\\_website.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/388308/household_projections_note_for_website.pdf)



- 2.8 As Tables 2.1 and 2.2 show, the comparison in trends decline in both the 25-34 and all ages groups. In this context, a continuation of this trend by the 2012-based CLG projections will see this suppression in household formation rates amongst the younger age groups continue, and a suppressed household projection for Brentwood will result.
- 2.9 It will therefore be pertinent to consider the 2012-based CLG projection (when released) in the context of the PPG guidance, which states the following:

**“Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.”<sup>2</sup> (Our emphasis)**

- 2.10 The aforementioned briefing note prepared by DCLG in preparation for the release of the 2012-based CLG projection reinforces how the new projections will be the ‘starting point estimate’ only in objectively assessing need, as follows:

**“Household projections are a starting point for local authority assessments of housing need but local factors are also important. It is for local planning authorities to determine the impact that they have on their Local Plans, which will inevitably differ from area to area.”<sup>3</sup> (Our emphasis)**

<sup>2</sup> PPG, Paragraph: 015 Reference ID: 2a-015-20140306, 06 March 2014

<sup>3</sup> 2012-based Household Projections for local authorities in England to be published in February 2015, DCLG, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/388308/household\\_projections\\_note\\_for\\_website.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/388308/household_projections_note_for_website.pdf)

2.11 However the 2012-based ONS SNPP/2012-based CLG projections only address demographic led need, the first step in establishing full OAN. The second stage is to consider economic led need.

**(iii) Economic Led Need**

2.12 The PPG states:

**“Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area.**

**Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.”<sup>4</sup> (Our emphasis)**

2.14 The implication is that the OAN will need adjusting upwards to support the labour force growth of the population, if required.

2.15 The PBA OAN concludes that economic-led need will be met by the provision of 5,430 dwellings, 2015-2030 (362 dpa). This conclusion is drawn from PBA referring to NLP's 'Brentwood Economic Futures 2015-2030' (December 2014), and that job creation under this level of housing supply (447 jpa) will outstrip the 'policy-off' job growth (383 jpa) forecast by NLP include in their report (December 2013 Experian baseline forecast).

2.16 We consider the level of job growth (447 jpa) below, in the context of more recent economic data and forecasts. However at the outset it is important to note how the level of job growth considered in any OAN should be 'policy-off'. In contrast the job growth underpinning PBA's conclusion on economic-led need is constrained by a housing provision target (362 dpa). This is considered to conflict with the PPG which states the following:

**“The assessment of development needs is an objective assessment 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, historic under performance, viability, infrastructure or environmental constraints.”<sup>5</sup> (Our emphasis)**

<sup>4</sup> PPG, Paragraph: 018 Reference ID: 2a-018-20140306, 06 March 2014

<sup>5</sup> PPG, Paragraph: 004 Reference ID: 2a-004-20140306, 06 March 2014

2.17 For Brentwood, the Edge Analytics Phase 6 report (September 2014) suggests that the 2012-based ONS SNPP scenario would support 185 new jpa. This is significantly lower than the 275 jpa modelled in the Jobs-led scenario of the Phase 6 EPOA report. The Phase 6 report shows how 275 jpa would require an 'average' growth of 426 dpa. The results of the EPOA Phase 6 report (including the 2012-based ONS SNPP scenarios we set out above) are set out below:

**Table 2.3: EPOA Phase 6 housing growth scenarios: Brentwood**

Scenario	Average annual dwelling requirement, 2012-37		
	Option A (2011-based)	Option B (2008-based)	Average
Jobs	420	432	426
Employed people	416	429	423
SNPP-2010	360	370	365
SNPP-2012	333	347	340
PG-5Yr	296	309	302
PG-5Yr-X	289	302	295
PG-10Yr	275	287	281
PG-10Yr-X	264	276	270
Natural Change	79	100	89
Net Nil	74	83	79

2.18 The PBA report (December 2014) references the work undertaken by NLP and presented in the 'Brentwood Economic Futures 2015-2030' (December 2014). The NLP report considers a 'policy-off' Experian job growth forecast that is considered to be outdated (December 2013), forecasting job growth of 383 per annum, 2015-2030.

2.19 The NLP report should also be considered in the context of more recent job growth forecasts by the East of England Forecasting Model (January 2015), which due to their release date, are not considered in the PBA OAN report, or the NLP report.

2.20 The job growth forecasts published in the Phase 6 EPOA report are taken from the 2013 East of England Forecasting Model (EEFM) baseline scenario, and as identified in the table above, lead to growth of between 420 and 436 dpa. This is underpinned however, by growth of only 275 new jobs per annum (jpa).

- 2.21 The Autumn 2014 baseline EEFM (released January 2015) shows growth of 537 jpa in Brentwood, between 2012 (the start year of the phase 6 report scenarios) and 2031 (the final year of the EEFM). Application of the 2011 Census commuting ratio (1.08)<sup>6</sup> results in a requirement to Plan for 580 labour force participants per annum. This would suggest a requirement significantly in excess of the 426 dpa set out in the Phase 6 report (above), to ensure that enough housing is provided for the economically active population that will result.
- 2.22 Crucially, the latest EEFM points to a higher dwelling requirement than the 362 dpa set out by PBA in their OAN (underpinned by only 447 jpa).
- 2.23 As the PPG states above, alongside forecasts, past trends should also be considered. Past trends incorporating the recessionary period are skewed due to the significant suppression in job creation during that period. However in looking at past trends, the 2014 EEFM shows the following job growth over a range of periods:
- 910 jpa, 2008-2013 (past 5 years);
  - 549 jpa, 2003-2013 (past 10 years);
  - 765 jpa, 1997-2013 (past 15 years);
  - 419 jpa, 2001-2011 (between 2001 and 2011 Census').
- 2.24 Notwithstanding the severe recessionary conditions in the UK between 2008 and 2013, job growth exceeded the forecasts of the 2013 EEFM (and modelled in the Phase 6 report), the job growth underpinning the Council's target of 362 dpa (447 jpa), and in the case of the 10 and 15-year periods, higher job growth than the latest 2014 EEFM forecast.
- 2.25 The conclusion that can be drawn is that there is strong evidence (from the latest job growth forecast by the EEFM 2014, and past trends in job growth) to suggest that economic led need in Brentwood is likely to significantly exceed 362 dpa.

#### **(iv) Market Signals**

- 2.26 The third stage in OAN is to consider market signals, particularly affordability. The PPG states how a worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.

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<sup>6</sup> 2011 Census, Origin-destination Statistics on Migration, Workplace and Students for Local Authorities in the United Kingdom, 25 July 2014

- 2.27 The market signals that should be analysed are land prices, house prices, rents, affordability, rate of development, and overcrowding.
- 2.28 Recent Inspector's Decisions on Local Plans (Eastleigh and Uttlesford) have suggested an increase of at least 10% to address worsening market signals.
- 2.29 In Brentwood it is important to note the ratio of lower quartile house price to lower quartile earnings, which has worsened significantly from 5.98 (in 1997) to 10.10 (2013). Of the 12 authorities in Essex this represents the third highest affordability ratio in 2013, and is significantly higher than the Essex (7.87), and national (6.45) averages. The increase in the ratio (69%) is also the 5<sup>th</sup> highest of the 12 Essex authorities over the 15-year period.<sup>7</sup>

**(v) Greater London**

- 2.30 Brentwood borders the GLA authorities and there is strong evidence to suggest that authorities outside of the GLA will need to accommodate the housing shortfall of the capital, which is expected to be a minimum of 6,600 dpa. The recent Inspector's report into the 'Further Alterations to the London Plan' (FALP, November 2014) acknowledged the role that will need to be played by authorities outside of the GLA.

**"The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need. The Mayor has committed to a review of the London Plan in 2016 but I do not consider that London can afford to wait until then and recommend that a review commences as soon as the FALP is adopted in 2015 (IRC3). In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city."**

*Paragraph 57, page 14, Report on the Examination in Public into the FALP (18 November 2014)*

- 2.31 Independent research by Nathaniel Litchfield Partners<sup>8</sup> (on behalf of Gladman Developments) suggests that Brentwood would need to accommodate 1.85% of any shortfall, based on migration and commuting patterns. This would equate to a minimum additional 122 dpa (based on the 6,600 shortfall identified in the FALP conclusions).

<sup>7</sup> [Table 576: ratio of lower quartile house price to lower quartile earnings by district, from 1997, DCLG](#)

<sup>8</sup> Appendix: Data Sets, London's Unmet Housing Needs Meeting London's overspill across the wider South East, Nathaniel Lichfield & Partners, April 2014

**(vi) Summary**

- 2.32 Whilst the increased housing target is supported, it should be acknowledged that further work is required in order to establish the correct OAN for the Borough. The current figure proposed in the PBA OAN (December 2014) is underpinned by a constrained 'policy-on' housing growth scenario which fails to accommodate the job growth forecast by the 2014 EEFM, or recorded in past trends.
- 2.33 Although the 2012-based ONS SNPP suggest that the forthcoming 2012-based CLG household projections will show household growth lower than 362 per annum, the CLG projections are the 'starting point estimate' only, as set out in the PPG. In preparation for the release of the 2012-based CLG projections, CLG have reinforced the PPG's guidance that they should only be regarded as the 'starting point estimate'. Economic and affordability factors must also be considered, alongside household formation rate assumptions.
- 2.34 The job led scenario in the Phase 6 Edge Analytics report (September 2014) is based on 275 new jpa, requiring at least 426 dpa. The latest forecasts from the 2014 EEFM, and recorded trends of job growth show significantly higher job growth in Brentwood (537 jpa), which would necessitate uplift from 362 dpa (as suggested by the Council), and 426 dpa (EPOA Phase 6 report).
- 2.35 Furthermore, market signals, specifically affordability, is considered to be acute in Brentwood when compared to the Essex and national averages, and suggests an uplift in OAN to alleviate these worsening trends.
- 2.36 Although no formal announcement has been made on the needs of Greater London, this should not be discounted, particularly in authorities which are adjacent to the GLA area, such as Brentwood.
- 2.37 Whilst we appreciate that National Policy recognises that the presence of Green Belt land may restrain the ability of an LPA to meet its need, the NPPF and PPG requires that LPA must first identify the full OAN, and then consider whether it is able to meet the full identified need. BBC has not yet done this.
- 2.38 Furthermore, in line with the National Policy approach, and to meet the tests of 'soundness', the SLP should positively seek opportunities to meet the development needs of its area. This is particularly important given that a number of surrounding authorities have confirmed, via representations to the previous POLP, that they would not accept any shortfall from BBC within their own boundaries.

- 2.39 In this regard, BBC should be striving for as higher levels of growth as possible. This should be considered in the context of the existing Green Belt sites being put forward for development, and those which could be released for development without significantly compromising the purpose of the Green Belt. This includes the Officer's Meadow Site.
- 2.40 The housing target will also need to take account of previous years shortfalls, as acknowledged at Para 1.15 of the SOGC. This will further increase the housing target for the Plan period.



### 3.0 MANAGING GROWTH/GROWTH OPTIONS

3.1 The 'Managing Growth' section of the SGOC confirms that 2,500 dwellings can be accommodated on brownfield land within the Plan period, and therefore, in order to meet the increasing housing target, BBC need to identify additional allocation sites within the Green Belt for residential development.

3.2 Para 2.12 confirms that the new Local Plan will need to set out a spatial strategy for where development of all kinds will be located, and for the purposes of the SOGC, the Borough has been split into three areas:

- (a) North of the Borough;
- (b) A12 Corridor;
- (c) A127 Corridor.

3.3 Shenfield, and the Site itself, are located within the A12 corridor.

3.4 The SGOC poses two questions on growth options:

**Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?**

**Q2: Do you agree with the issues raised within each of these areas?**

3.5 These are considered in turn below.

**(i) Q1: Broad Areas for growth**

3.6 Paragraph 2.12 confirms that the three broad areas identified within the SGOC have been drawn up to focus on existing transport corridors. Para 2.13 confirms that each of the areas should not be considered in isolation, with each having different issues to consider, and with the potential to accommodate different approaches to development.

3.7 Whilst we have no objections to the broad areas identified in the SGOC (January 2015), it is important that "transport corridors" are not the only defining feature when considering where future growth should take place. There are many other factors to take into consideration, including:

- The ability of the transport corridors to accommodate additional growth, either as existing or through improvements to the existing network. There is no evidence presently available in this regard;

- The sustainability of individual settlements, including the availability of facilities and services. A settlement hierarchy was included within the POLP (July 2013);
- The capacity of the landscape to accommodate development. The Landscape Capacity Assessment (2006) is current being updated, and a Green Belt Assessment is being produced;
- The capacity of infrastructure/ the ability to improve existing infrastructure to accommodate additional development. BBC is commencing work on its Infrastructure Delivery Plan; and
- The availability of suitable sites for development. The SHLAA (2011) is currently being updated.

3.8 The spatial strategy and “areas of development” will therefore need to be informed by the Local Plan Evidence Base, the majority of which is emerging and not yet complete.

**(ii) Q2: Issues within Individual Growth Areas**

3.9 Given that the majority of the Evidence Base to inform the Local Plan is still being prepared, it is not clear how BBC has identified “issues” for each of the 3 broad areas set out.

3.10 By way of example, for the A127 Corridor, which contains the single settlement of West Horndon, BBC provide a positive conclusion rather than “issues”:

**Due to the different character and availability of suitable land the capacity for growth is potentially greater than elsewhere in the Borough. Although the A127 suffers from congestion problems, it has more scope for improvements than the A12.**

3.11 This conclusion appears to have stemmed from the previous POLP (July 2013) which included a strategic allocation at West Horndon for 1,500 dwellings. As set out in our previous representations (October 2013), given the lack of evidence, it is not considered “justified” to conclude that West Horndon has greater potential for growth/the release of Greenfield Green Belt site than elsewhere in the Borough.

3.12 Whilst the Landscape Character Assessment (September 2006) concludes that the area has a “moderate” sensitivity to change, compared to “high” sensitivity within the remainder of the Borough, this is now over 8 years old and is currently being updated.

3.13 Whilst appreciating that land in West Horndon may be “available” for development, the SHLAA (October 2011) identifies only suitable brownfield sites within West Horndon (as

included in the large strategic area identified in the POLP 2013). All Greenfield/greenbelt sites are not considered "suitable" for development. The SHLAA is currently being updated.

3.14 Further, there are a number of other factors that need to be considered. Notably:

- Has BBC or Essex County Council (ECC) (as Highways' Authority) identified that improvements could be made to the A12 to accommodate growth? And does this demonstrate that there is more scope to improve the A127 rather than the A12? There is no evidence available to that effect.
- Whilst West Horndon is supported by a railway station and connections to the transport network, it offers limited facilities and services, and as a result was identified as a Tier 3 settlement within the POLP (July 2013). Notably the POLP (July 2013) recognised that it required "significant improvements to infrastructure and services" (Para 2.13).

3.15 By way of comparison, BBC's assessment of the A12 corridor is limited, and simply states that there are brownfield and Green Belt development opportunities and:

**Access to Brentwood from the A12 is only from Brook Street (M25 Junction 28) and Mountnessing (A12 junction 12), bypassing the town centre but limiting the outlet of local congestion.**

3.16 There is no evidence available that demonstrates that local congestion of the A12 corridor is an issue, or that it could not be overcome by suitable improvements. The benefits of each "broad area" should also be identified, notably that the A12 includes Brentwood and Shenfield, the two most sustainable settlements within the Borough. Further information on the benefits of the A12 corridor is set out in Section 4 of this report.

### **(iii) Future Growth Strategy**

3.17 Notwithstanding our concerns with the approach of the consultation document, it is considered likely that the final growth strategy for the Borough will need to include a proportion of development within each of the broad areas, in line with the sustainability credentials of each of the settlements, informed by the emerging evidence base documents and strategic priorities of the Borough. Housing should be largely proportionate and appropriate to each settlement and greater in number for the larger settlements that would be able to accommodate, and provide for, sustainable growth.

## 4.0 SUSTAINABLE COMMUNITIES

4.1 Section 3 of the SGOC relates to the creation of “sustainable communities” and poses 4 No. questions:

**Q3:Do you have any comments on the appropriateness of particular sites?**

**Q4:Given the greater capacity for growth along the A127 corridor, which of the sites put forward do you think is the best location for growth?**

**Q5:Should the A12 Corridor accommodate growth by releasing sites on the edge of the urban areas?**

**Q6:In order to provide for local need is it preferable for greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within Green Belt)?**

### a) Question 3 and 5 - A12 Corridor

4.2 It is considered that the A12 corridor should accommodate growth by releasing sites on the edge of the urban areas. The area of the A12 corridor includes the main towns of Brentwood and Shenfield, the two most sustainable settlements within the Borough.

4.3 Shenfield scored highly in the Settlement Hierarchy included within the POLP (July 2013), with Brentwood and Shenfield being identified as the only ‘main town’ settlements in Tier 1 of the settlement hierarchy, with the POLP (para 2.13) concluding:

**Brentwood and Shenfield offer the most scope to development in accordance with sustainable development principles;**

**Brentwood and Shenfield are considered sustainable locations for growth, given excellent transport links access to jobs and services and town centre facilities.**

4.4 For this reason, it is considered that Brentwood and Shenfield should provide for an adequate proportion of housing needs in the Borough. This would provide a “sound” strategy in accordance with the “justified” and “effective” tests.

4.5 The allocation of Green Belt sites on the edge of the Shenfield will ensure that it receives a proportionate amount of development. Such allocations would:

- Make a substantial contribution to meeting local housing need, in an area that is likely to be in high demand following the introduction of Crossrail;

- Secure an effective and balanced supply of dwelling types and tenures;
- Ensure that the economic vitality of the settlement is maintained and enhanced.

4.6 It is considered that the "Officers Meadow" site is the most appropriate Green Belt site on the edge of Shenfield to meet this need. Notably, it is one of only two greenfield sites within the SHLAA (October 2011) deemed to have potential for residential development in Shenfield, the other being a small infill plot.

4.7 Further information on the suitability of the Site for residential development is set out in Section 6 of this document, and the supporting Development Framework Document (Barton Willmore, February 2015).

**b) Question 6 - Green Belt sites**

4.8 The use of brownfield sites is generally encouraged within National policy and is likely to be preferred by a large proportion of respondents. However it should be noted:

- It is unlikely that there will be sufficient suitable brownfield sites on the edge of the Green Belt (or within the Green Belt) to meet the remainder of the housing target, particularly in the more sustainable settlements of Brentwood and Shenfield;
- By their nature, Brownfield sites/infill sites are smaller and are often not of a size or scale that can deliver larger family housing;
- Brownfield sites are often unable to provide the level of affordable homes or community benefits that, for instance, greenfield sites could deliver. The recent changes to S106 thresholds are relevant (PPG Ref 23b-012-20141128) which sets out that affordable housing contributions should not be sought from sites of 10 units or less, with a combined floorspace of no more than 1000sqm.

4.9 Therefore, whilst we support the use of brownfield sites generally, it is important that BBC does not create an over-reliance on the release of brownfield in the emerging development strategy. The provision of both brownfield and greenfield/Green Belt sites will be required to meet BCC's overarching objectives, and to meet its increasing housing needs.

4.10 When identifying suitable Green belt sites for development, BCC will need to assess the quality of the Green Belt sites and their contribution to the five "purposes" of the Green Belt, as set out in Para 1.11 above.

**c) Question 4 - A127 Corridor**

- 4.11 This question creates an assumption for strategic development at the A127 corridor. As set out in Section 3, it is not considered suitable to conclude that the A127 has a greater capacity to accommodate growth, as BBC has not published sufficient evidence to 'justify' this and demonstrate that this is the case. This is therefore a leading question.
- 4.12 As set out above, BBC is consulting on the proposed "Dunton Garden Suburb" alongside the SGOC. This is a joint consultation with Basildon Borough Council to explore a potential opportunity for cross boundary development in the Dunton area. BBC states that by developing this potential option, there would be less pressure to develop elsewhere in Brentwood in order to meet housing need.
- 4.13 The site area of "Dunton Garden Suburb" is also located within part of Broad area "A127 Corridor" and West Horndon. The suggestion at Para 3.12 of the SGOC that the Dunton Garden Suburb is an alternative to strategic Greenfield/ Green Belt development along the A127 corridor, rather than an addition to, is supported. It would be inappropriate to allocate both a new settlement and large strategic greenfield allocation within this area, as a substantial proportion of BCC future housing need would then be met in one area of the Borough, away from the 2 most sustainable settlements of Brentwood and Shenfield.
- 4.14 Should BBC choose to pursue the allocation of Dunton Garden Suburb, BBC will need to identify sufficient sites elsewhere in the Borough, including Shenfield, in order to meet its housing need requirement in the shorter term and to ensure a proportionate dispersal of development to meet the Boroughs needs.

**d) Approach to the growth areas**

- 4.15 As per our comments on Section 2 of the SGOC, it is not considered that BBC has given a fair and neutral approach to the development options for each of the broad areas. For the A127 corridor, no constraints are identified.
- 4.16 By way of comparison, for the A12 corridor, the SGOC (Para 3.13) states that while the release of Green Belt sites adjoining urban areas could be suitable for sustainable urban extensions, development of this kind could have negative impacts on infrastructure and services.

- 4.17 This contradicts with the conclusions of the previous POLP (2013, Para 2.3). Furthermore, the introduction of Crossrail in Shenfield will further support growth within the area and bring inward investment, which should be maximised.
- 4.18 As the question and Section is phrased, this may result in a biased response on the “preferred” development option going forward.

## 5.0 ENVIRONMENT AND INFRASTRUCTURE

### (i) Environmental Protection and Enhancement

5.1 Section 5 of the SGOC poses three questions relating to open space and landscape, and asks respondents to score the value of the landscape near where they live.

5.2 Para 5.8 advises:

**As part of the landscape evidence currently being undertaken, it would be helpful to gain an insight into how many people view their local landscape where they live. Answering the following two questions will help inform the landscape evidence before it is published, which will then inform the decisions**

5.3 Whilst we have no objection to the Council seeking to gain an understanding of local residents' perceptions of landscape "value", the outcomes of the survey should not be used to inform the landscape evidence currently being produced. This should be an Objective assessment undertaken by a qualified professional.

### (ii) Infrastructure and Quality of Life

5.4 We would agree with the general Infrastructure considerations set out in section 6 of the SGOC. However, once again we reiterate our comments regarding the presumption that the A127 corridor is the most suitable option for growth, with a current lack of evidence to justify this.



## 6.0 OFFICERS MEADOW (SITE REF 034)

- 6.1 The site at Officers Meadow is identified within the SGOC as "site 034". It should be noted that the area identified within the SGOC does not comprise the full boundary of Croudace Strategic Land interest. The correct site boundary is included in the accompanying Development Framework Document (DFD, February 2015).
- 6.2 The Site comprises a series of fields located immediately to the north of Shenfield. Historically the Site has been in agricultural use, but it is now mainly rough pasture/scrubland.
- 6.3 Although located within the Green Belt, the Site forms an enclave of open land framed for the most part by existing development and transport infrastructure. As a development opportunity that would have little environmental impact on the locality, the Site benefits from effective physical and visual enclosure. It is well placed to accommodate future development by virtue of its sustainable position in close proximity to Shenfield. The Site was put forward in response to the SHLAA's 'Call for Sites' exercise in December 2009.

### (i) SHLAA (October 2011)

- 6.4 Officers Meadow, Shenfield, is identified in the SHLAA (October 2011) as a 'Potential Greenfield Site'. The Site (ref G091) is considered suitable for a medium density typology having a net dwelling capacity of some 500 dwellings.
- 6.5 SHLAA sites are considered to be 'developable' and 'deliverable' if assessed as being 'available', 'suitable' and 'achievable'. As set out in the SHLAA, Officers Meadow meets all these criteria:
- **Available- the Site is available now.** There are no insurmountable site constraints or legal/ ownership issues which might prejudice development.
  - **Suitable- the Site is ideally located for accommodating a highly sustainable development.** For the most part it comprises unused scrubland and it is identified in the SHLAA as being located in a sustainable location, close to Shenfield shopping area and rail station. The Site is located on a bus route which provides direct access to the Town Centre. It is enclosed by the Chelmsford Road, woodland and railway lines which place limits on further encroachment into the countryside.

- **Achievable- the Site is deliverable in the next five years.** The Site is not constrained by any landscape or environmental designations. As a greenfield site it is not constrained by existing development or activities.

## **(ii) Development Proposals**

- 6.6 The accompanying Development Framework Document (Barton Willmore, February 2015) sets out more detailed information on the development proposals, including a summary of the specialist technical assessments that have been undertaken on the Site in order to inform the initial development proposals and demonstrate that the Site can accommodate residential development.
- 6.7 An emerging Concept Masterplan has been prepared for the Site, demonstrating how it could be developed and setting out the main design principles for access (vehicular and pedestrian), developable areas, open space and landscape strategy.
- 6.8 It is envisaged that the site would deliver between 360 - 480 dwellings, depending on the density of development, ranging from 30dph to 40dph. It is envisaged that the development would offer a range of dwelling types and tenure, with a variation in density across the Site. The initial technical work demonstrates that densities at the higher end of the above range would be suitable in the central and southern parts of the Site, and lower density on the northern edge.
- 6.9 The proposed access would be from Chelmsford Road, with a potential secondary/emergency access on Alexander Lane.
- 6.10 An east/west green corridor across the site linking the existing public footpath on the eastern flank to Chelmsford Road would provide a multifunctional open space alongside the stream which separates the main part of the site from Shenfield High School playing fields. This green corridor could also accommodate surface water attenuation basins and provide opportunities for enhanced biodiversity and informal recreation.
- 6.11 Existing mature trees across the site would be retained and protected. The existing hedgerows and tree screening along the northern boundary would be reinforced to preserve the privacy of neighbouring residential properties fronting Chelmsford Road. A generous area of public open space incorporating woodland would be provided at the eastern end of the site providing a significant buffer to the railway.

**(iii) Economic Role/Social Benefits of Scheme**

- 6.12 The NPPF sets out three dimensions to sustainable development, these being economic, social and environmental. Para 152 of the NPPF confirms that LPAs should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and deliver net gains across all three.
- 6.13 The NPPF confirms that pursuing sustainable development involves seeking positive improvements to people's quality of life including:
- Making it easier for jobs to be created in cities, towns and villages; and
  - Improving the conditions in which people live, work, travel and take leisure; and
  - Widening the choice of high quality homes.
- 6.14 There are many potential economic, social and environmental benefits which could arise from development at Officers Meadow. These include:
- Provision of a wide range of much needed housing in a highly sustainable location;
  - Provision of generous areas of public open space;
  - Strengthening of Shenfield's vitality and viability;
  - Delivery of a significant number of affordable homes;
  - Contributions towards improved community facilities;
  - Making a substantial contribution to meeting the Borough's overall housing need on a well contained site, thereby protecting more sensitive and visual sites from development;
  - The creation of direct construction jobs plus additional indirect jobs;
  - New Homes Bonus payment (over 6 year period) of £2.6M generated by the scheme.
- 6.15 More specifically, an Economic Benefits Statement undertaken by Barton Willmore (February 2015), confirms:
- The gross value added (GVA) generated by future residents of the proposals would total approximately **£23.3m per annum** (based on current values and **612** future residents in employment, figures subject to rounding);
  - The provision of up to 480 dwellings will also generate convenience goods expenditure of **£2.7m**; comparison goods expenditure of **£4.4m**; and expenditure of leisure goods and services of **£3.6m per annum** (figures subject to rounding);
  - BDBC would gain circa **£3.2m** from the New Homes Bonus Scheme;

- There will be **100 jobs** created through the construction of the Site (based on an average delivery of 50 units per annum over a 9 year construction phase) . Local workers will be very well placed to take advantage of these opportunities during the build-out period (figures subject to rounding); and
- In addition, Croudace also offers local apprenticeships in carpentry and brick-laying.

6.16 It is understood that BBC is exploring the potential to extend the current area of Merrymede Country Park located to the south of the Site. The proposed development could potentially provide a proportionate contributions towards such improvements, subject to viability and compliance with the Community Infrastructure Levy Regulations (as amended) 2010.

6.17 It is also understood that Shenfield High School wishes to enhance its current sporting facilities. There is the opportunity to provide improved recreational facilities to serve Shenfield High School, with the existing playing fields (approximately 4.4ha) to the south west of the Site then being utilised for residential development. The existing school playing fields will only be developed if the school can secure alternative, improved facilities prior to the development taking place.

#### **(iv) Deliverability**

6.18 The SHLAA (October 2011) recognised the Officers Meadow sites' highly sustainable credentials and its suitability for residential purposes. In our view there is nothing to prevent development of the Site coming forward in the early stages of the plan period and contributing towards BBC's housing land supply in the short term.

## 7.0 CONCLUSION

- 7.1 We fully support BBC's recognition that the Local Plan needs to be revisited following consultation on the POLP, notably that the proposed housing requirement has increased in the light of OAN.
- 7.2 However, we consider that there is further work to be done in order to ensure BBC is working towards a "Sound" Local Plan. Notably, the current proposed housing target needs to be revisited to identify full OAN, as required by National policy.
- 7.3 It is also vital that the emerging evidence base is made available prior to any next stage of formal consultation on Local Plan. Without these, BBC will be unable to make an informed decision on future growth strategies for the Borough, nor will the public be able to make informed comments.
- 7.4 As set out within the main body of this report, we are also concerned that the Council continues to promote "West Horndon" as offering the greatest potential for growth within the Borough, yet no evidence has been provided to demonstrate that this is the case.
- 7.5 Notwithstanding our concerns, it is considered likely that the final growth strategy for the Borough will need to include a proportion of development within each of the broad areas, perhaps including "West Horndon"/DGS, in line with the sustainability credentials of each of the settlements, and informed by the emerging evidence base documents and strategic priorities of the Borough.
- 7.6 As acknowledged within the previous POLP (July 2013), Shenfield represents one of the two most sustainable settlements in the Borough, and is recognised as a sustainable location for future growth. Shenfield's sustainability will be considerably further increased following the arrival of Crossrail. It is therefore considered that a proportionate amount of future housing growth should be allocated to Shenfield in the emerging growth strategy.
- 7.7 Initial technical work and further information set out in the supporting Development Framework Document (Barton Willmore, February 2015), along with BBC's own SHLAA assessment (October 2011) demonstrate that the Site is suitable for residential development. We will continue to undertake further technical studies to gain a greater understanding of the opportunities and constraints of the Site, and to demonstrate its suitability for development.
- 7.8 The future growth strategy should therefore make a provision for major development at the Officers Meadow site.