



BRENTWOOD
BOROUGH COUNCIL

Local Plan 2015-2030
Preferred Options
July 2013
COMMENT FORM

(For official use only)

Comment
No.

Ack. date

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

Please indicate which section(s) of the Local Plan you are commenting on (please clearly state the Policy reference or paragraph number): *Paragraphs 2.34 and 2.20*

POLICY 52 Amount and Distribution of Residential Development 2015-2030

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

Support

Object

Comments (please use additional sheet if required):

See attached sheet

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

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

All responses should be received by Wednesday 2nd October 2013

Housing Numbers

Within Policy S2 the Council recognises the need for 3500 new dwellings to be built in the borough during the Plan period of 2015 – 2030. It also states the figure includes, existing commitments and also sites recognised as having housing potential during the Brentwood Strategic Housing, Land Availability Assessment (SHLAA) 2011.

The Council conducted their own Objectively Assessed Needs for Brentwood Study that was carried out by Peter Brett Associated on behalf of the Council in 2013. This study concluded that rather than 3500 new dwellings needed in the borough the figure was actually much higher at 5430 new dwellings needed over the Plan period. The East of England Plan that was due to run until 2021, before being abolished, identified that Brentwood required 3600 new homes. In effect the Council are suggesting 100 fewer homes are built in a period that stretches 9 years beyond the East of England Plan !

The Council accept that there is a high level of demand for housing from people seeking to move into the area. Around 80% of projected household growth will be from people moving into the area. It is healthy for people wanting to move into the area and will benefit local business.

It is interesting to note that the Housing Growth Scenario Study 2012 carried out by Brentwood, Maldon and Chelmsford specifically did not consider the objectively assessed needs of the Councils. In the study the figure of growth for Brentwood borough was 3500 new dwellings which as can now be seen from a later study is woefully short of the required number of new dwellings over the Plan period. The Council have decided in their Preferred Options that the earlier figure, produced by them, of 3500 fits in with their aims and have therefore ignored the most up to date study commissioned by the Council that confirms more housing is needed in the borough over the Plan period.

One of the major reasons the Council gives to limiting development in the borough is the effect on the green belt. The problem is that the whole borough effectively lies within the green belt, so unless development is within one of the villages excluded from the green belt, whose boundaries are tightly drawn, or in Brentwood itself development will have to take place in the green belt. By taking this stance the Council is basically saying there will be no further development within the borough, unless the name of the village is West Horndon where the green belt is expendable.

The whole Policy S2 needs to be relooked at to enable flexibility and to allow small scale development within the green belt in sustainable locations especially regarding public transport ie bus routes. The borough of Brentwood needs to grow and adapt not just West Horndon. Housing numbers need to reflect the objectively assessed needs for the borough and not a figure that meets the Council's perceived requirements.

People want to live in the borough as it is well served by public transport, particularly Brentwood and Shenfield. This need will increase with the arrival of Crossrail which will service both Shenfield and Brentwood and will shorten train journeys, whilst giving direct access to the West End of London and Heathrow Airport. Villages that are close to Brentwood and Shenfield and are well served by public transport should be expanded to allow for expected growth, this is where people will want to live. Also places outside the villages but where there are already a number of dwellings and lie on one or more bus routes within walking distance of local schools, this is where people will want to live. The Council in its enthusiasm to safeguard the green belt amongst all else, have over looked this

point and instead directed too much development towards West Horndon and not accepted the number of dwellings actually required by the borough as shown in their latest study.

The road network within the borough is in general very good and works effectively. There are inevitably minor delays in the rush hour and if there has been an accident but driving around the borough there are relatively few delays. It is questioned whether the Council are exaggerating the problem of the road network being unable to cope with the proposed number of 5430 new dwellings in the Plan period especially if the dwellings are situated throughout the borough. A high proportion of new dwellings will be in Brentwood where car usage will be reduced thereby negating many of the concerns regarding the road network.

The Council mention in paragraph 2.34 that minimal allowance has been made for Windfall sites. Actually 9% of total housing need has been allocated to Windfall sites which is not minimal. The figure of 22% over the past 5 years is high and reflects the confusion in the planning system and the fact a number of large sites have come up which would not be considered the norm.

A recent study commissioned by the Town and Country Planning Association (TCPA) has shown that more than 240,000 extra homes per year, on top of the 100,000 currently being built, will be required in England over the next 20 years and that the scale of housing need and demand continues to outstrip supply. The study showed that nearly two-thirds will be required in the South. The number of homes being proposed in the Preferred Options does not reflect the Council's own commissioned study, neither does it reflect the study commissioned by the TCPA. It is clear that the figure proposed of 3500 homes over the Plan period is inadequate to cope with demand.

In paragraph 2.20 the Council state that: "Following a technical exercise to objectively assess development needs, as national policy advises, the Council's preferred spatial strategy seeks to accommodate a significant proportion of this need". Based on the Council's figures they are proposing to meet just 64% of the identified need, a figure that would not normally be described as significant. In effect the Council are proposing not to accommodate 36% of development housing needs as identified in the study the Council themselves commissioned. This lack of development will put increasing strains on the housing market within the borough, being exacerbated by putting so much development in West Horndon, it will worsen affordability and restrict access to adequate housing.

The TCPA study recognises that as the economy moves back towards longer-term patterns of growth, even more housing investment will be required to meet resultant needs. The economy has started to show signs of a sustained recovery which brings into question whether the 5430 new dwellings mentioned in the Council's commissioned Study will be enough to meet the borough's needs over the Plan period.