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### **Brentwood Borough Local Plan: Strategic Growth Options Consultation**

Persimmon Homes Essex would like to submit the following comments on the Strategic Growth Options Consultation.

Brentwood Borough Council consulted on their Preferred Options document in 2013. This identified four growth opportunities – Centralised Growth, Transport Corridor-led Growth, Semi- Dispersed Growth and Dispersed Growth. However, since the Preferred Options consultation, Brentwood Objectively Assessed Needs (OANS) have increased and as such are required to identify additional land to meet this need.

#### *Housing Target*

The Preferred Options document sought to deliver 3,500 new dwellings over a 15 year period (2015-2030). This figure was derived from the Regional Spatial Strategy (RSS) which has now been revoked. Brentwood's latest Strategic Housing Market Assessment (SHMA) 2014 identifies a need for 5,430 (362 per annum) over the 15 year plan period. This is an increase of 187 dwellings per annum from the current housing target of 175 dwellings per annum as identified in the Preferred Options document. Whilst this increase is welcomed an update to the population projections is expected to be published in the coming months which the council must consider going forward.

However, the council do not appear to make any allowance for the shortfall that will have being accumulated since the revocation of the RSS in 2013. Persimmon Homes calculates this shortfall to be in the region of 724 dwellings. The document looks to extend the new Local Plan to cover the 2 year period between 2013 and 2015. Paragraph 47 of the National Planning Policy Framework (NPPF) 2012 required local planning authorities to "*use their evidence base to ensure that their Local Plan meets the full OANS...*" Figures from this consultation document would indicate that the council have yet to examine any shortfall, and as such the proposed 5,500 new dwellings over the 15 year period are not meeting their OANS in full.

The Greater Essex Demographic Forecasts (Phase 6) 2014 calculates a net increase of 21% for Brentwood – the 8<sup>th</sup> largest increase in Essex. Paragraph 3.4 further goes on to state that "*the migration relationship between the north east London Boroughs and the Essex Planning Officers Association (EPOA) local authorities is most significant for those areas that are immediately contiguous with the Greater London Boundary*". It is therefore crucial that the Local Authority considers their housing position in relation to the London housing market.

The Greater London Authority (GLA) Draft Housing Strategy 2014 indicates that it is unable to meet its objective housing target, with a predicted shortfall of 7,000 units per annum. The 2013 London Strategic Housing Market Assessment establishes a housing need of 49,000 units per annum over the long-term, but a

need for 62,000 was shown over the short-term. Therefore a potential shortfall in housing numbers as high as 20,000 per annum. Despite there being no guidance or legal agreement to require neighbouring local planning authorities to make allowance for this shortfall, growth from London will occur as demand moves outwards, and it is the council's duty to meet this requirement as part of their OANs.

### *Managing Growth*

The Strategic Growth Options consultation assesses three growth options which can deal with the identified shortfall of 3,000 units. The council believe that 2,500 units can be accommodated through the redevelopment of brownfield sites in Brentwood and Shenfield but it is acknowledged that the remaining 3,000 units will be accommodated through the release of land in the Green Belt for development. The consultation document states that the three areas should not be considered in isolation, but the council must ensure that development is allocated to the most sustainable locations which we discuss further in the next section.

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

The three broad areas identified for the purposes of this consultation document are:

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

Persimmon Homes supports the Council in identifying three broad areas for growth. Each of the areas can demonstrate unique constraints and opportunities towards both economic and residential development.

It is clear that no one area for Growth can be relied upon to support the numbers that the authority is likely to need to meet their OAN. The A127 corridor provides opportunities for large strategic sites, delivering infrastructure improvements to an important corridor whilst also demonstrating the Authorities ability to collaboratively plan for growth with Basildon District. This area in particular has the ability to provide the additional 3000 homes the Council have indicated they need to deliver within the plan period.

### ***Q2: Do you agree with the issues raised for each of these three areas?***

The A12 growth corridor allows the Borough to take advantage of some key infrastructure improvements, in particular the opening of CrossRail, in the near future. This will not only significantly increase demand for residential properties in the area, but improve the desirability of the area to key businesses wanting easy access to London, whilst not having to pay the large rental charges for office space in the Capital.

It should therefore be considered that large strategic sites in this area could provide an important mixed use, also providing key job opportunities for existing local residents. Given the likelihood of an increase in demand in the area the Local Authority should ensure that a range of properties are provided, from small starter housing to family housing. The historical undersupply of houses in the area, coupled with a large amount of redevelopment of the existing stock has resulted in a reasonably constrained property market. This has increased house prices out of reach of those starting out on the property ladder. The Council

acknowledges that growth in the A12 corridor could be heavily reliant on the redevelopment of brownfield land and as such, unlikely to be developed in the first 5 years of the plan.

In addition to the fast rail links into London from both the A12 and A127 growth corridors the areas also benefit from good strategic road links to the M25 and beyond.

The area to the North of the Borough incorporates a very different rural character, slightly remote from the strategic rail and road routes previously mentioned. This area, whilst important to acknowledge, could not sustain the housing numbers required by the Council without significantly altering the character of existing villages. As a result it is suggested that this part of the Borough is identified for smaller development, adjacent to the settlement boundaries that could perhaps help boost the provision of housing in the early years of the plan. It is clear that the likely size of these sites will be unable to contribute significantly towards infrastructure improvements in the Borough however with the provision of CIL they could still provide much needed resources.

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

Persimmon Homes acknowledges that the sites identified in the consultation document are not suggested allocations at this stage, merely the sites that have come forward during the Call for Sites process. It is suggested that whilst this is a good starting point for the Council it has been seen within the recent Maldon Examination in Public that the Inspector was concerned whether the Council had looked at all reasonable alternatives. It is therefore suggested that the Council allow the submission of further sites for consideration until perhaps the Preferred Options Stage is reached.

Persimmon Homes believes that there has historically been an undersupply of affordable housing in the Borough; it is presumed this could be due to the viability of schemes coming forward. If this is the case it should be ensured that a number of larger schemes are allocated which are more likely to be able to provide these much needed homes. The NPPF states that the policies contained within the Local Plan should not render schemes unviable and therefore early consultation with Developer Interests should be undertaken to try and establish a realistic affordable housing target.

The Council will obviously be mindful of the emphasis within the NPPF to deliver sustainable sites, this inevitably puts the emphasis on the A12 and A127 corridor areas to support the largest amount of growth. Given the high percentage of Green Belt in the authority it is also suggested that sites close to the settlement boundary or with defensible boundaries are considered.

It is acknowledged that the West Horndon site is not a new suggested site and therefore has already been assessed in terms of its sustainability and deliverability through previous consultation documents. The site to the east of the A128 and bounded by the A127 to the north, is also subject to a separate consultation document by the Council and therefore Persimmon Homes reserves the right to comment upon this site in more detail within that document.

It is noted that there is a large number of sites identified to the south east of Hutton, it is felt that large scale development in this area should be careful not merge the existing settlements which gives them a distinctive character. The

Council should also be mindful of utilising defensible boundaries where possible as this could help with the public perception of any potential allocation.

***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?***

Paragraph 52 of the NPPF requires Authorities to assess all site opportunities and therefore Persimmon Homes recommends that the Council allow the submission of further sites for consideration up until the latter stages of the process. The Council should also ensure that all sites are assessed thoroughly, with the reasons for their inclusion/exclusion is well documented. Sites should be considered against their sustainability and deliverability credentials, including the phasing of development and mitigation required.

Paragraph 52 of the NPPF also states that "...new housing can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns..." Development in the A12 and A127 corridors will allow the Council to deliver housing in accordance with this principle.

It is noted that there is a separate consultation document on the potential growth in the Dunton area and as such Persimmon Homes reserves the right to comment on this in more detail through that process. It is felt that the extension to Horndon provides a good opportunity to use Previously Developed Land in an area, well served by rail and the strategic road network.

Both large strategic sites in the A127 corridor will undoubtedly require some infrastructure improvements and given the potential size of these sites it is unlikely that houses would be delivered within the first 5 years of the plan. The Council could seek to help improve delivery of these sites by engaging in discussions with Developers early or ensure that elements such as Design Codes are not required which could ultimately delay the start on site by months or even years.

It is felt that the Dunton extension may require more infrastructure improvements than that at West Horndon given the quantum of development currently being discussed between the Brentwood and Basildon Authority areas. If Dunton were to be allocated it is likely delivery will be seen in the Basildon Authority first with the latter phases within the Brentwood boundary. Given this likely phasing Brentwood should consider whether Dunton should be allocated in addition to West Horndon, albeit on the premise that the plan period, is extended past the minimum period of 15 years to ensure the delivery of these homes is well planned.

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

As previously discussed the A12 corridor is an important one, not only for the Borough but for the Region of Essex. With CrossRail due to open in the near future the potential for significant investment should be taken to ensure further infrastructure improvements are delivered. It is openly acknowledged by the Highways Agency that the M25 Junction 28, Brook Street roundabout, is already over capacity and therefore the impact of development on this route should be carefully considered.

If improvements are required to this key junction, as well as perhaps upgrades to the wider strategic road network, the Council should consider whether there is a

quantum of development needed in Borough to help fund these upgrades. This funding could be through pooled S106 contributions, ultimately leading to larger allocations in the A12 corridor, or whether there is some funding that could be provided through CIL. The Authority should also have early discussions with the Highways Agency and explore other avenues for funding. It may be that by extending the plan period past the minimum of 15 years may help the Council unlock more long term funding.

By allocating sites on the edge of urban areas the highway impact is likely to be minimised as the sites will ultimately be more sustainable. The enhancement of pedestrian and cycle connections should also be considered, as well as whether there is any scope for improving connectivity to the rail stations. In addition the provision of further employment sites within the Borough will not only reduce the potential for out-commuting but bring in further investment into the area.

The growth in the A12 corridor provides opportunities for development utilising the strategic highway network as a defensible boundary to prevent urban sprawl and the coalescence of settlements.

***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)?***

In order for Brentwood to meet their Objectively Assessed Needs the Council need to ensure that a range of different sites are allocated. Brentwood has a large percentage of Green Belt within the Authority and therefore significant numbers are only likely to be realised through this release; however the NPPF supports the early release of Brownfield land. It should be acknowledged that Brownfield release will have higher remediation costs. Early discussions with Developer Interests will ensure that any emerging policy is sound by not rendering a site unviable through contributions that cannot be sustained. This will help the Borough demonstrate the soundness of their allocation sites and policies when examined in front of an Inspector.

The strategic growth options consultation document acknowledges that brownfield land in the Borough can only accommodate 2,500 homes; therefore the council will have to allocate Greenfield, and ultimately Green Belt sites, to meet their Objectively Assessed Needs.

Kind Regards

Sarah Kirk

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