

## **Background Report to Brentwood Draft Local Plan Preferred Site Allocations**

1. Brentwood Borough Council published their Regulation 18 Draft Local Plan Preferred Site Allocations 2018 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for a period of six weeks from 29 January 2018, and is seeking comments. Epping Forest District Council as one of the neighbouring authorities has been invited to make comments on the Regulation 18 Local Plan. The Brentwood Regulation 18 Draft Local Plan Preferred Site Allocations 2018 covers the timeline 2013-2033. It follows consultations on the Strategic Growth Options (2015) and Draft Local Plan (2016). The plan contains an updated vision, objectives and spatial strategy to reflect progress made on the technical evidence and a review of representations received on previous consultations. It sets out the preferred sites for housing, specialist accommodation, including that for Gypsies and Travellers, and employment in addition to infrastructure considerations regarding schools and GP provision.
2. The spatial strategy has been adjusted since the last consultation and now, in addition to a focus on the concentration of new development on land within the Borough's transport corridors, with Brentwood and Shenfield as the main focus – there is more development proposed in larger villages. The strategy for higher level strategic housing growth remains the same – to create sustainable urban extensions and a new garden village at Dunton Hills to the south east of the Borough on the boundary with Thurrock Council. Housing sites are drawn from a mix of land including greenfield land, brownfield land and green belt land. Some town centre car parks are included for redevelopment as well as existing employment sites and some open space. The plan contains informative material regarding the potential need arising from housing growth in terms of health and education provision in the localities.
3. A revised quantum of housing from the 2016 Draft Plan is contained in the Preferred Site Allocations. An uplift for market signals and some flexibility in delivery is reflected in the revised figure of 380 dwellings per annum (2016 Draft Plan figure was 362 dpa). This identifies a need of 7,600 dwellings across the plan period and allocates 6,151 dwellings and a total of 8,263 units including completions, commitments (forecast completions and commitments) and windfall. However, the plan does not include additional provision against the Governments standard housing need methodology consulted upon in September 2017. This methodology would give rise to a need for an additional 1480 dwellings (in addition to the calculated 7,600) across the plan period – a total of 9,080 dwellings over the plan period. This would leave a shortfall of 817 dwellings over the plan period. The Council is however, seeking means to accelerate delivery of the Dunton Hills Garden Village site by bringing an addition 1000 dwellings forward within the plan period. It is not clear that this will be possible and a shortfall may persist.
4. Brentwood Borough Council is a core member of the Cooperation for Sustainable Development Board but not included in the West Essex/ East Herts Strategic Housing Market Area. There is no expectation that Epping Forest District Council would meet any of the unmet need for housing including that for Gypsies and Travellers arising from Brentwood Borough Council. It is therefore sensible to note that the Council should seek clarity in the Regulation 19 plan regarding how the apparent shortfall in housing against the new standard method for establishing housing need will be met- assuming this is introduced as expected.
5. Provision for Gypsy and Traveller pitches amounts to 78 pitches for travellers. This comprises 12 pitches needed for households that meet the planning definition of a Traveller, whilst provision is being made for 66 households that either do not meet the definition or form 90% of 'unknown' need. (The Essex Wide GTAA Summary Report January 2018 notes 59 households not meeting the definition, with an identified need for

11 pitches to meet the needs of travellers who meet the planning definition and up to 8 for unknown households). The Council has therefore chosen to make provision for the full future need including that for households who do not meet the planning definition through the allocation of pitches. The approach is welcomed.

6. Brentwood Borough Council does not share a strong functional economic relationship with Epping Forest District Council area and broadly looks to South Essex and London. Commuting areas overlap with broadly the eastern third of Epping Forest District. This is not a particularly strong relationship with around 100-250 commuters travelling in each direction daily in 2011 according to the Councils Economic Futures Report undertaken by Lichfields (2018). The need for employment land is identified as being between 8.1ha and 20.3 ha. Allowing for the strategy of some loss to existing employment land to residential via allocations and allowance for permitted development changes the a combined requirement is assessed at 33.76ha to 45.96ha and allocations total 47.93ha in a range of business locations.
7. The proposed allocations closest to Epping Forest District boundary are located at the villages of Kelvedon Hatch and Blackmore. Any cross boundary transport impacts are expected to be mitigated. As it stands background growth assumptions which take into account future development within adjoining districts and beyond have been taken into account within Epping Forest District Council's Transport Modelling through the use of TEMPRO growth assumptions. This is the nationally recognised approach to understanding wider traffic growth over the plan period.
8. Brentwood Borough Council will no doubt continue to take an active role as a core member of the West Essex and East Herts Cooperation for Sustainable Development Board. It is advisable to continue to maintain a watching brief on any Memorandum of Understanding. In particular the Council should be aware of the ongoing work on a mitigation strategy that Epping Forest District Council is undertaking with partners under the Memorandum of Understanding "Managing the impacts of growth within the West Essex/ East Hertfordshire housing market area on Epping Forest Special Area of Conservation".
9. The Council is pleased to note that the Brentwood Borough Council's Draft Local Plan Regulation 18 Preferred Site Allocations is broadly consistent with the Epping Forest District Local Plan Submission Version 2017. We note that the Council should be clear with regard to how it intends to meet the full housing need identified by the Governments standard methodology, within its own boundaries in its Regulation 19 submission plan, should there be a failure to accelerate delivery of the garden village. A letter is attached to be sent to Brentwood Borough Council from EFDC as the formal response to the publication of their Draft Local Plan Regulation 18 Preferred Site Allocation offering support, together with some words of caution.