

Public Document Pack



SUPPLEMENTARY AGENDA 1

Dear Councillor

EXTRAORDINARY COUNCIL - WEDNESDAY, 15TH NOVEMBER, 2017

I am now able to enclose, for consideration at next Wednesday, 15th November, 2017 meeting of the Extraordinary Council, the following reports that were unavailable when the agenda was printed.

Agenda No	Item
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| 4. | <u>Local Development Plan (LDP) Update (Pages 3 - 150)</u> |
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Yours sincerely

Chief Executive

Encs

15 November 2017

Extraordinary Council

Brentwood Local Development Plan Update

Report of: *Phil Drane – Planning Policy Team Leader*

Wards Affected: *All Wards*

This report is: *Public*

1. Executive Summary

- 1.1 The Council is required to produce a new Local Plan for the Borough. A significant amount of work has gone into preparing this plan to date, and more will be required as the Council reaches the final stages. As part of this process there is a need to undertake further Regulation 18 preparation and consultation. This process is summarised in Appendix A.
- 1.2 As part of this a range of evidence is being undertaken and updated where relevant. Recently completed evidence studies relating to market housing and specialist need, Green Belt, and economy are attached in Appendices B-G.
- 1.3 Working with adjoining authorities, who are also preparing for growth, and considering the wider area in which the Borough contributes to, requires strategic leadership and representation.

2. Recommendations

- 2.1 Approve preparation of work set out in Appendix A, to commence further Regulation 18 Local Plan consultation.**
- 2.2 Note the update provided on evidence base as set out in Appendices B, C, D, E, F and G, for the LDP Scrutiny Working Group to scrutinise content.**
- 2.3 Approve the formal designation of the Deputy Leader of the Council as Chair of the LDP Member Working Group, to assist the Leader of the Council to carry out tasks relating to strategic leadership and Duty to Cooperate representation.**

3. Introduction and Background

3.1 The National Planning Policy Framework (NPPF) requires local planning authorities to produce a Local Plan for their area (Paragraph 153). Brentwood Borough Council is producing a new Local Development Plan and has undertaken various stages of public consultation as part of the plan making process. The plan will set out a long-term vision for how and where the Borough will develop over the next 15-20 years (to 2033) to meet local needs but in line with our unique local character, our “Borough of Villages”.

3.2 Appendix A provides a comprehensive overview of previous plan-making work, current progress and next steps. It also includes summaries of the evidence base to date and recently completed studies. Content of the Appendix (Local Plan Update Report) is as follows:

a) Introduction: Preparing the Local Plan

b) Plan-Making and Evidence Base

c) Meeting our Housing and Accommodation Needs

- i. Specialist accommodation
- ii. Deliverable and developable housing sites
- iii. Site assessments
- iv. Five Year Housing Land Supply
- v. Brownfield Register
- vi. Pulling the analysis together

d) Economic Prosperity

- i. Local Plans and economic growth
- ii. Brentwood Economic Futures Report: 2013-33
- iii. Brentwood’s functional economic market area
- iv. Economic base and forecasts
- v. Employment land supply and balance
- vi. Qualitative issues, market feedback and strategy conclusions

e) Environmental Protection and Enhancement

- i. Green Belt
- ii. Landscape studies
- iii. Green Infrastructure
- iv. Flood risk and water infrastructure

f) Transport, Movement and Connectivity

g) Other Evidence Material

- i. Sport and recreation study
- ii. Infrastructure Delivery Plan (IDP)

h) Spatial Strategy

- i. Delivering sustainable development

- ii. Sequential land use and settlement hierarchy
- iii. Reviewing reasonable alternatives
- iv. Strategic options assessment and finalising reasonable alternatives

i) Strategic Growth

- i. A127 Growth Corridor
- ii. Dunton Hills Garden Village
- iii. Brentwood Enterprise Park

j) Duty to Cooperate

k) Project Management

l) Next Steps

m) Additional Appendices

3.3 In addition to the summary provided of the current evidence base in Appendix A, recently completed evidence studies relating to market housing and specialist need, Green Belt, and economy are attached in Appendices B-G.

3.4 Several accompanying projects, both planning related and corporate strategies, overlap with preparation of the plan. In addition, the plans of adjoining authorities need to be considered when planning for the wider area, through Duty to Cooperate discussion.

4. Issue, Options and Analysis of Options

4.1 As part of the plan-making process the Council is required to consider a wide range of issues, including national policy and guidance and market factors, in addition to local constraints and issues. As several considerations have changed since the last round of Local Plan consultation in early 2016, and following full consideration of representations received in response to that consultation, the Council needs to undertake further Regulation 18 consultation. This is in support of preparing a plan as swiftly as possible whilst considering all the issues amongst a changing planning environment. Appendix A sets out much of the detail ahead of this further Regulation 18 consultation so that this can be considered in an appropriate timeframe (although time remains short to continue preparing the Plan). The alternative is to present lots of detailed information at once, and so the intention is to release information as it becomes available to reduce the burden of reviewing detail at the same time as a consultation document is being proposed.

4.2 As evidence is now nearing completion, with other elements ongoing, this is an appropriate time to share work so far and request that the LDP Scrutiny Working Group consider the work.

4.3 Amongst this plan-making process, the planning environment is changing very quickly taking into account growth aspirations and constraints in the wider area that the Borough sits. Through Duty to Cooperate discussion the Council is speaking with partners to ensure appropriate strategic planning is being considered amongst several administrative boundaries. In light of this it has become apparent that a strategic lead is required from the LDP Member Working Group to assist the Leader of the Council in representing the Council at Duty to Cooperate discussions etc. It is recommended that the Deputy Leader of the Council fulfils this role.

5. Reasons for Recommendation

- 5.1 It is necessary to undertake further public consultation as part of the plan-making process to thoroughly consider the views of stakeholders and members of the public. Consultation and consideration of comments will enable the Council to move forward and submit the Plan for examination in public by an independent planning inspector.
- 5.2 The next stage is to undertake further Regulation 18 consultation with the public in January 2018. Appendix A sets out current progress and issues being assessed ahead of that consultation, which include further work with partners such as Essex County Council on highway modelling; and Duty to Cooperate discussion with neighbouring districts such as partners in South Essex and wider plans for growth in the region, among other things. Recommendation 2.1 sets out the need for approval of the process to progress towards this Regulation 18 consultation in January 2018. Recommendation 2.3 sets out the need for a strategic lead to represent the Council in discussions with partners through the Duty to Cooperate.
- 5.3 It is important that the plan is informed by robust and up-to-date evidence. This evidence base needs to be wide ranging to consider all the intricacies of the plan-making process. A summarised update is provided on the evidence base in Appendix A and recently completed studies are set out in Appendix B-G. The approved scope of the LDP Scrutiny Member Working Group is to consider the appropriateness and proportionality of the evidence base. Recommendation 2.2 sets out the need to scrutinise recently completed and drafted evidence which will take place at future scrutiny working group meetings ahead of reporting to Scrutiny Committee.

6. Consultation

- 6.1 The Local Plan has undergone a series of public consultations in past years and further consultation will be undertaken in line with statutory requirements. The next stage of public consultation will be on further Regulation 18 preparation and will take place in January 2018.

7. References to Corporate Plan

- 7.1 The Local Development Plan is a key priority in the Council's 'Vision for Brentwood' Corporate Plan 2016-2019. The Plan also provides a vehicle to assist delivery of several other corporate priorities.

8. Implications

Financial Implications

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- 8.1 The cost of carrying out further Local Plan consultation has been accounted for within the planning policy budget.

Legal Implications

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- 8.2 The Localism Act 2011 places a legal duty on local planning authorities and other defined local bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. It is not a duty to agree, but local planning authorities must make every effort to secure the necessary cooperation before they submit their Local Plan for examination. The cooperation should produce effective and deliverable policies on strategic cross boundary issues.

9. Background Papers

Brentwood Draft Local Plan, Brentwood Borough Council (January 2016)

10. Appendices to this report

Appendix A: Brentwood Local Plan Update Report (November 2017)

Appendix B: Strategic Housing Market Assessment Summary, PBA (September 2017)

Appendix C: Gypsy and Traveller Accommodation Assessment (Draft), ORS (November 2017)

Appendix D: Brentwood Economic Futures 2013-2033 – Final Draft Report, Lichfields (November 2017) – TO FOLLOW

Appendix E: Green Belt Review Working Draft – Part 1, Crestwood Environmental (November 2017)

Appendix F: Green Belt Review Working Draft – Part 2 (Summary), Crestwood Environmental (November 2017)

Appendix G: Green Belt Review Draft Parcel Map, Crestwood Environmental (November 2017)

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Appendix A: Brentwood Local Plan Update Report – November 2017

INTRODUCTION: PREPARING THE LOCAL PLAN

1. The Council needs to produce a new local plan (referred to as ‘the plan’), which will set out a long-term vision for how and where the Borough will develop over the next 15-20 years (to 2033) in line with the unique local character of the area. The plan will propose a clear spatial vision, a sustainable pattern of land allocations for development and planning policies to guide decisions on the location, scale and type of development and changes in the way land and buildings are used. The plan will also need to provide the right range of community and physical infrastructure at the right time to support sustainable development.
2. The key recent public consultations informing the direction of the plan include the Strategic Growth Options Consultation (2015), and the Draft Local Plan (2016), which included both draft planning policies but also potential housing and employment site allocations. The detail from these consultations will be subject to a separate report at the next stage of formal consultation on the plan, but some of the key headlines are detailed below:
 - a) **Housing sites** - considerable objections to proposed sites for new homes. Site specific objection and petitions received for: Honeypot Lane, Priests Lane and Hatch Lane area (not proposed).
 - b) **Development generally** - need better explanation for selection of sites and justification of rejection and unclear if all options for locating development have been considered. No growth option should be seriously considered. Disagree that new homes are needed to this extent. Proposals just encourage new people to come to borough rather than provide for existing residents. Object to proposed developments as the impact on existing residents and local infrastructure is too high. Concerned that development is proposed near high pressure gas pipes and high voltage electric lines.
 - c) **Types of housing** - need more affordable homes and more smaller homes to downsize to. Need a mixture of new homes of different size and tenure.
 - d) **Green Belt** - objection to any development in Green Belt. Concerns raised over incremental release of Green Belt and support for building on brownfield only. Higher density development needed to reduce Green Belt release.
 - e) **Corridor strategy**- objections received for Dunton Hills Garden Village in principle. Object in principle and to the extent of development in the south of the borough. Impact on Basildon of development is too great, object to development along the A127. Development should focus on the A12 corridor. Need to distribute housing and economic growth throughout the borough and not just the south.
 - f) **Plan evidence** - more evidence needed: to justify location of proposed development sites: Highway impacts, junction modelling and mitigation; infrastructure impacts and

need; education; health care, particularly GPs; public transport; Objectively Assessed Housing Need; Strategic Housing Market Assessment; historic windfall statistics; affordable homes need; strategic green belt review; viability; SA, HRA and SEA updates; Gypsy Traveller and Travelling Showpeople need assessment; settlement hierarchy; economic impacts of Crossrail; landscape assessment; historic asset impacts and infrastructure information. New development must have timely new infrastructure.

- g) **Environmental considerations** - need to encourage policies and proposals which incorporate measures to reduce traffic generation at source. Must conserve all wildlife sites and support indicated for environmental protection.
 - h) **Duty to co-operate** - more information on engagement with other boroughs on strategic matters.
3. A total of 1,281 people or groups made representations to the Draft Local Plan (2016) consultation. Many consultees made multiple representations in response to the draft policies and particularly on proposed sites. In total, 3,942 representations were made, approximately 11.6% were submitted directly onto the Council's online Local Development Plan portal, 51.7% of which were submitted via email and the remaining 36.7% were submitted on paper. Of the total representations made, 12.8% were in support; 24.8% were comments and 62.4 % were objecting to part of the plan.
4. In light of responses received and emerging new national planning policy directions and focus upon delivering sustainable development, officers have been working with a range of specialist consultants to enhance the evidence base to the plan and develop a strategy which is considered both sound and sustainable. This report focuses upon some of the emerging new evidence base for the plan, the direction of travel in the plan and the critical path to delivering a sustainable plan for the Borough.
5. Detail on next steps and indicative timetables are set out later in this report. The Council is not yet at the stage where it is finalising sites as evidence is still being gathered.
6. The Council consulted on the Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule between 27 October and 8 December 2016. Specific issues raised included:
- a) **Valuation study** - Should cover settlements to the south of the A127; Base data should include adjoining areas.
 - b) **Proposed charges** – Should be more comparable to adjoining areas to prevent issues of viability for nearby proposed developments; Joint charging zones could be an appropriate; Charging rate should not be determined until the funding gap that CIL needs to be fund is established; Rate reviews should be undertaken bi-annually; CIL should be reviewed if market changes significantly; Proposed charges may act as disincentive for development in Brentwood, an average family home will be charged circa £20k; Support nil rate for non-residential development; £200 per square metre (psm) rate is too high and will render allocated sites undeliverable; Question why rate has risen £70 psm since 2013; Will cost £16k for average sized home, typically see costs between £6k and £9k across Essex; Blanket charge of £200 psm for food retail

development (A1) proposed would be one of the highest in the south east of England; High rate for food retail reduces viability for smaller supermarkets, may be appropriate to introduce tiers of differentiation.

- c) **Strategic Sites** - Major strategic sites should be zero rated for CIL with infrastructure funded by S106; Concerned that it is premature to confirm CIL rates in respect of large strategic sites such as Dunton Hills Garden Village, likely that zero rate is appropriate; Larger strategic sites require major infrastructure delivery but this has not been reflected in the viability report; Implications of CIL charges on larger schemes (500+) needs to be appraised.
 - d) **Installments policy** - Should be used cautiously due to costs of collecting multiple payments; Considered appropriate and necessary to reduce pressure on cashflow and viability.
 - e) **Discretionary relief** - Likely to open unwelcomed loop-holes; Important where development affects heritage assets and their setting and CIL could make them unviable; Useful for large strategic sites where there are many variable factors through the life of the development.
 - f) **CIL timetable**: Production of CIL is considered to be premature in advance of a sound plan being established.
 - g) **IDP & Regulation 123 List** - Not apparent that CIL has been suitable informed by the IDP and Reg 123 List; No evidence as to what infrastructure items and projects CIL is intended to fund.
 - h) **Affordable Housing** - Affordable rent has been assumed as the only delivery mechanism for affordable housing, a more realistic tenure mix should be applied as per the SHMA; Delivery of affordable housing should be a priority as only 15.4% of homes built between 2001-2014 were affordable.
 - i) **Viability Assessment** - No allowance for site servicing infrastructure as a cost within the appraisals; Interest of 5% assumed for development finance is low in comparison to the standard 6% or 7% across the industry; Development of brownfield land does not appear to have been taken into account; Concerned over the number of assumptions used in the assessment this should be reviewed and corrected where necessary.
7. Since this consultation, further work has also been undertaken on the financial viability analysis for a number of the proposed allocation sites and it is likely that a refresh of the CIL evidence base may be required to support the next stage of public consultation on the CIL, which is scheduled to be undertaken alongside the Regulation 18 consultation on the plan. Significant work has also been progressed on producing a supporting Infrastructure Delivery Plan to accompany both the plan and CIL.

PLAN-MAKING AND EVIDENCE BASE

8. The production of a sound plan rests upon a solid foundation base of evidence. The evidence base for the plan also needs to be up to date and reflect any changes in national planning policy and guidance. Table 1 sets out the current status of the main evidence base for the plan. Work on the plan has been undertaken over a number of years and some of the original evidence base will be superseded shortly by more up to date material. Where appropriate, the list of evidence base material will be updated on the Council's website.

Table 1: Review of Evidence Base

Updates (published)	Under Development	Published but Currently Under Review	Likely to be Superseded
Sustainability Appraisal			
Brentwood Scoping Report (May 2013)			Sustainability Appraisal: Scoping Report 2009
Brentwood Local Plan Interim SA Report (Aug 2013)			SEA Baseline Information Profile 2006-7
Strategic Growth Options – Interim SA (Jan 2015)			Core Strategy – Sustainability Appraisal of Issues and Options 2009
Draft Local Plan Interim SA and Non-Technical Summary (Feb 2016)			Gypsies and Travellers DPD
			Interim Sustainability Appraisal Report (2008)
			Final SA Report (2009)
	Local Plan Interim SA (2018)		
Duty to Cooperate			
	Duty to Cooperate Statement and Action Plan (2018)		
Consultation			
	Consultation Statement (2018)		
Economy			
Economic Futures 2013-2033 Draft Report (Draft)			Economic Futures 2015-2030 Final Report and Exec Summary
	Retail and Commercial Leisure Study Update (2018)	Retail and Commercial Leisure Study Final Report and Exec Summary (Dec 2014)	
Economic Futures 2013-2033 Draft Report (Draft)		Heart of Essex Economic Futures Study (June 2012)	
Economic Futures 2013-2033 Draft Report (Draft)	Brentwood Borough Housing and Employment Land Availability Assessment (HELAA) 2018	Employment Land Review – Final Report and Exec Summary (Sept 2010)	
Environment			
Green Belt Review Part 1 Strategic Overview (2017) (Draft)			
Green Belt Review Part 2 Parcels (2017) (Draft)			
	Green Belt Review Part 3 Site Assessments (2018)	Green Belt Assessment (March 2016)	
	Green Belt Review Part 4 – Boundaries (2018)		
Green Infrastructure Strategy (Sept 2015)	Green Infrastructure Audit and Action Plan (2018)		
Surface Water Management Plan for Brentwood Borough			

(January 2015)			
Renewable Energy Study (April 2014)			
	Local Wildlife Sites Update (2018)	Local Wildlife Sites Review (Dec 2012)	
Strategic Flood Risk Assessment (SFRA) Nov 2017 (Draft)			Strategic Flood Risk Assessment (SFRA) Feb 2011
	Water Cycle Study Update (2018)	Water Cycle Study (Feb 2011)	
Mid Essex landscape Character Assessment (Sept 2006)			
	Brentwood Landscape Capacity Study (2018)		
	Conservation Area Boundaries and Appraisals (2018)	Conservation Area Boundaries and Appraisals (various)	
	Heritage Assets (Local List) (2018)		
Housing and Demography			
	SHMA Part 2 (Update 2018)	SHMA Part 2 (June 2016)	
Brentwood OAN Summary 2017	SHMA Part 1 (2018)	SHMA Part 1 (Dec 2014)	
		Greater Essex Demographic Forecasts 2012-2037	
		Heart of Essex Housing Growth Scenarios (June 2012)	
	Brentwood Borough Housing and Employment Land Availability Assessment (HELAA) (2018)		Strategic Housing Land Availability Assessment (October 2011)
	Affordable Housing Viability Assessment (2018)		Affordable Housing Viability Assessments (August 2010)
Draft Gypsy and Traveller Needs Assessment (Nov 2017)			Gypsy and Travellers DPD SA
	Brownfield Register		
Self and Custom Build Register			
	Site Assessment Methodology and Review (2018)		
Transport			
	Highways Modelling and Multi-modal Study (2018)	Highways Modelling – Draft Report (Feb 2016)	
	Cycling Action Plan (2018)		
Leisure, Recreation and Town Centres			
	Indoor Facilities Strategy (2017) / Playing Pitches Strategy (2018) / Green Infrastructure Audit and Action Plan (2018)		Open Space, Sport and Leisure Needs Assessment – Final Report (August 2016)

	Town Centre Design Plan / Town Centre Design Guide (2018)	Brentwood Town Centre Regeneration Strategy (May 2010)	
	Retail and Commercial Leisure Study Update (2018)		Hotel & Visitor Accommodation Futures Study (April 2008)
Strategic Growth Areas			
	A127 Growth Corridor Study (2018)		
	Dunton Hills Masterplan (2018)		
	Town Centre Design Plan / Town Centre Design Guide (2018)		
Delivery, Viability and Infrastructure Planning			
	Dunton Hills Viability Study (2018)		
	Whole Plan and CIL Viability Assessment (2018)		Whole Plan and CIL Viability Assessment (May 2016)
	CIL Land and Property Value Appraisal Study (2018)		CIL Land and Property Value Appraisal Study (April 2016)
	CIL Viability Construction Cost Study (March 2018)		CIL Viability Construction Cost Study (March 2016)
	Draft Infrastructure Delivery Plan (2018)	Draft Infrastructure Delivery Plan Update Note (October 2016)	

9. A number of draft evidence base reports are discussed in summary below and attached as technical appendices to this report where available.

MEETING OUR HOUSING AND ACCOMMODATION NEEDS

Objectively Assessed Housing Need

10. Based upon the best available evidence at the start of 2016, the Draft Local Plan (2016) set out an objectively assessed housing need of 362 dwellings per annum, for the lifetime of the plan (2013-2033), which equaled 7,240 dwellings in total. Consultancy work by Peter Brett Associates (PBA) in the form of the Strategic Housing Market Assessment (SHMA) (Part 1) 2015 report and a subsequent report on affordable housing provision (Part 2 of the SHMA) underpinned the Draft Local Plan (2016) position.
11. Since the SHMA was published in 2015, the Office for National Statistics (ONS) and Department for Communities and Local Government (CLG) have released new data, which have been considered as part of assessing housing need and as required by national planning policy and guidance. The key dataset releases included: the 2014 based household projections and two rounds of Mid-Year Population Estimates (MYP) in 2015 and 2016. Comparing the 2012 and

2014 CLG household projections reveals a slight uplift in households from 308 to 332, which converted to dwellings from the household data suggests an increase from 322 to 348 net new dwellings. This level of objectively assessed need (OAN) remains lower than PBA's previously recommended housing need.

12. In line with National Planning Practice Guidance, housing assessment studies should test official demographic projections to see if they seem a reasonable reflection of underlying trends. PBA has looked at testing the housing assessment, via:
 - a) Reviewing household formation rate data (time series and local data);
 - b) Reviewing the CLG relatively short-range projections against longer range projections;
 - c) Meeting employment needs; and
 - d) Reviewing market signals (such as house prices, affordability, market rents, overcrowding and concealed households).
13. The review of demographics and employment variables has not indicated a need to consider a higher level of housing above the updated demographic data level (348 dwellings). The tests have indicated that the official projections are unstable – partly a product of the short-term (5 year) trend period used in the projections. It is considered that a short-term increase in migration data for one of the years (2014 data point) in the official projection, particularly impacts on the short-term based forecast for Brentwood. Longer term demographic projections indicate a much lower demographic figure for Brentwood of circa 280 dwellings per annum. PBA consider 280 dwellings per annum (dpa) as a suitable and more stable baseline demographic starting position.
14. However, importantly due to the worsening of the affordability ratio in Brentwood and the increased costs of rental levels, the consultants have concluded that there is a need for a reasonable market signal adjustment for Brentwood. Compared to most of Essex, the district is much less affordable, homes are more expensive and now less affordable than the last housing boom. The degree of market signal uplift is a matter of professional judgment and PBA have indicated a 30% uplift above the new 280 dpa demographic baseline plus a small contingency of 6% should new official projections indicate a slightly different position to that forecast or expected.
15. In summary, using the minimum revised net dwelling baseline figure (280) plus combined market signal adjustment and contingency adjustment of 36% this leaves a OAN of circa 380 dwellings per annum or 7,600 dwellings across the plan period (2013-33). This revised OAN is an increase of 380 dwellings across the plan period compared to the Draft Local Plan (2016) OAN position in 2015/16. A technical update note by PBA is included as Appendix B.
16. The production of SHMA's are complex and often contested, creating significant problems for local authorities attempting to progress local plans. The Department for Communities and Local Government (CLG) has recently consulted on the methodology for a standardised approach to calculating local housing need in England to which the Council has responded raising concerns

over the bias in the affordability uplift calculation used and the volatile nature of the short-term projection data in the official demographic projections, amongst other factors. Using the currently proposed standardised methodology and datasets Brentwood would see an increase in its OAN to 454 dwellings per annum, 73 additional dwellings per annum. It is important to note that this proposal is for consultation and the Government will need to consider consultation responses on technical points before progressing. The Council will continue to use the latest OAN evidence to inform plan-making, i.e. 380 dpa.

17. For plan-making, officers are currently working through site options and reviewing any scope to meet the higher OAN figure, should this apply at the time the plan is submitted. Officers are also considering whether it would be prudent for the local authority to have a set of sites which technically delivers housing numbers slightly above the 380 dpa OAN figure to create some degree of flexibility or contingency should some housing sites fail to come forward as expected.

Specialist Accommodation

18. The OAN for the Borough does not take into consideration specialist accommodation need linked to residential care homes / nursing homes (classified as C2 – ‘residential institutions’ under the Use Classes Order), and Gypsy & Traveller pitches and accommodation provision.
19. National planning guidance advises (para 21) that the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). The Council’s published SHMA Part 2 (2016) uses the Strategic Housing for Older People Analysis Tool – SHOP, which is available from the Housing Learning and Improvement Network (LIN). The Elderly Accommodation Council (EAC) classifications are used for the purpose of defining residential care and nursing care accommodation as follows:
 - a) **Residential care:** Where a care homes is registered to provide residential (personal) care only, all beds are allocated to residential care.
 - b) **Nursing care:** Where a care homes is registered to provide nursing care all beds are allocated to nursing care, although in practice not all residents might be in need of or receiving nursing care.
20. **Need for Residential Institutions (Use Class C2).** The current need for this care as identified through the SHOP analysis is 494 spaces for residential care and 342 spaces for nursing care equalling 836 spaces in total. A snapshot of current provision using the EAC database indicates a total provision of 805 spaces, suggesting a current shortfall of 31 spaces. The published SHMA Part 2 identifies a forecast requirement for 424 spaces within Registered Care to be provided between 2013-2033 (21.2 spaces per annum). This is housing for people living in registered care homes which are managed and run by a care provider who is responsible for all aspects of their daily needs and wellbeing. Such housing is not self-contained and is often referred to as either residential or nursing care. As part of monitoring the plan, officers will be preparing a detailed

housing trajectory which will include specialist housing and accommodation indicators, including those for C2 spaces.

21. A Gypsy and Traveller Accommodation Assessment (GTAA) has recently been prepared by specialist consultants Opinion Research Services (ORS), the Brentwood GTAA (October 2017) forms part of a wider study that covers the whole of Essex. Due to the complexity of this wider study, the overall Essex GTAA Report has not yet been completed. However, the fieldwork has been completed for Brentwood and a final assessment of need has been undertaken providing the Council with a summary of the levels of need for the period 2016-33 to provide evidence for its plan, this is included as Appendix C.
22. The GTAA 2017 identifies those Gypsies, Travellers and Travelling Showpeople which should be planned for in accordance with the Government's Planning Policy for Traveller Sites Statement (PPTS), as they meet the 2015 planning definition of 'travelling' households, and those which should otherwise have their specific cultural needs of living accommodation met in accordance with the Equalities Act 2014, the Children's and Families act 2014 and the Human Rights Act 1998, but do not meet the 2015 planning definition of 'travelling' households and are referred to as 'non-travelling'. Through the survey a number of 'unknowns'¹ were also identified.
23. Brentwood has a reasonably modest Gypsy and Traveller need requirement for the period 2016-2033, calculated to be:
 - a) Gypsy and Travellers which meet the planning definition (PPTS) (+10% of unknown need) = 12 pitches
 - b) Gypsy and Travellers not meeting the planning definition (+90% of unknown need) = 66 pitches
24. There are currently no transit sites in the Borough although the GTAA (2017) recommends the Council engage, through the Duty to Cooperate, with other Essex authorities to establish whether there is a need for investment in more formal transit sites or emergency stopping places. ORS advise a review of the evidence base relating to unauthorised encampments should be undertaken in autumn 2018 once there is a new 3-year evidence base following the changes to PPTS in 2015. The GTAA 2017 finds no evidence of need for Travelling Showpeople accommodation within the Borough.
25. It is likely that the provision of sites / pitches towards meeting this need will follow a sequential approach, as outlined below:
 - a) Vacant / available pitches and commitments;
 - b) Potential additional pitch provision at existing expired and temporary sites;

¹ The GTAA identifies 16 households where it has not been possible to determine the planning status. The needs of the households where an interview was not completed have been considered as part of the GTAA. Interview data collected and completed by ORS since the changes to PPTS in 2015 suggests that overall a national average of approximately 10% of households who have been interviewed meet the definition, in the absence of further information this ratio can then be applied to unknown households.

- c) Unauthorised sites which may be potentially suitable for regularisation;
 - d) Potential intensification of existing Traveller sites;
 - e) Potential extension of existing Traveller sites;
 - f) Identification of new sites aligned to the settlement hierarchy and preferred allocation sites.
26. In line with monitoring for residential care spaces, officers will also be establishing a set of specialist accommodation indicators for travelling and non-travelling households and pitch provision.

Deliverable and Developable Housing Sites

27. While work has been progressing on establishing an updated housing and accommodation need position, attention has also been given to reviewing the delivery capacity of previously identified housing sites. This has included finetuning and revising net delivery rates, developable areas and density calculations, as well as updating the planning status of each site. Officers have also commissioned and completed work on a Brentwood Town Centre Design Plan, which has also informed potential site yields. The National Planning Policy Framework (NPPF), is clear in the need for local plans to be supported by a robust set of evidence on deliverable (within the first 5 years of the plan) and developable (years 6 to 10 of the plan) housing sites.²
28. The Draft Local Plan (2016) included a table of potential proposed housing allocation sites (Figure 7.2), which is replicated below in Table 2. This followed from all sites being listed in the Strategic Growth Options (2015) consultation document. Comments have been added against each site following further detailed work on site delivery and developability. It can be noted that the overall approximate dwelling yield from this set of draft allocations has dropped from 5,155 dwellings to circa 4,920 units (decrease of 235 dwellings in total). This work is still under and a final decision on sites will be indicated in the next formal consultation on the plan (further Regulation 18 consultation).

Table 2 – Draft Local Plan (2016) Original Proposed Housing Allocations

Site Ref	Site Name	Original Approx. Dwellings	Comments	Updated Dwellings
	Urban Area			
001A & 001B	Land north of Highwood Close including St Georges Court, Brentwood [redevelopment to include replacement of lost sheltered housing]	52	No net gain forecast in dwelling numbers	0
003	Wates Way Industrial Estate, Ongar Road, Brentwood [mixed use including retail]	80	No change in yield	80
005	Essex County Fire Brigade HQ,	50	Potential increase in site yield linked	132

² NPPF Footnote 11: To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. NPPF Footnote 12: To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

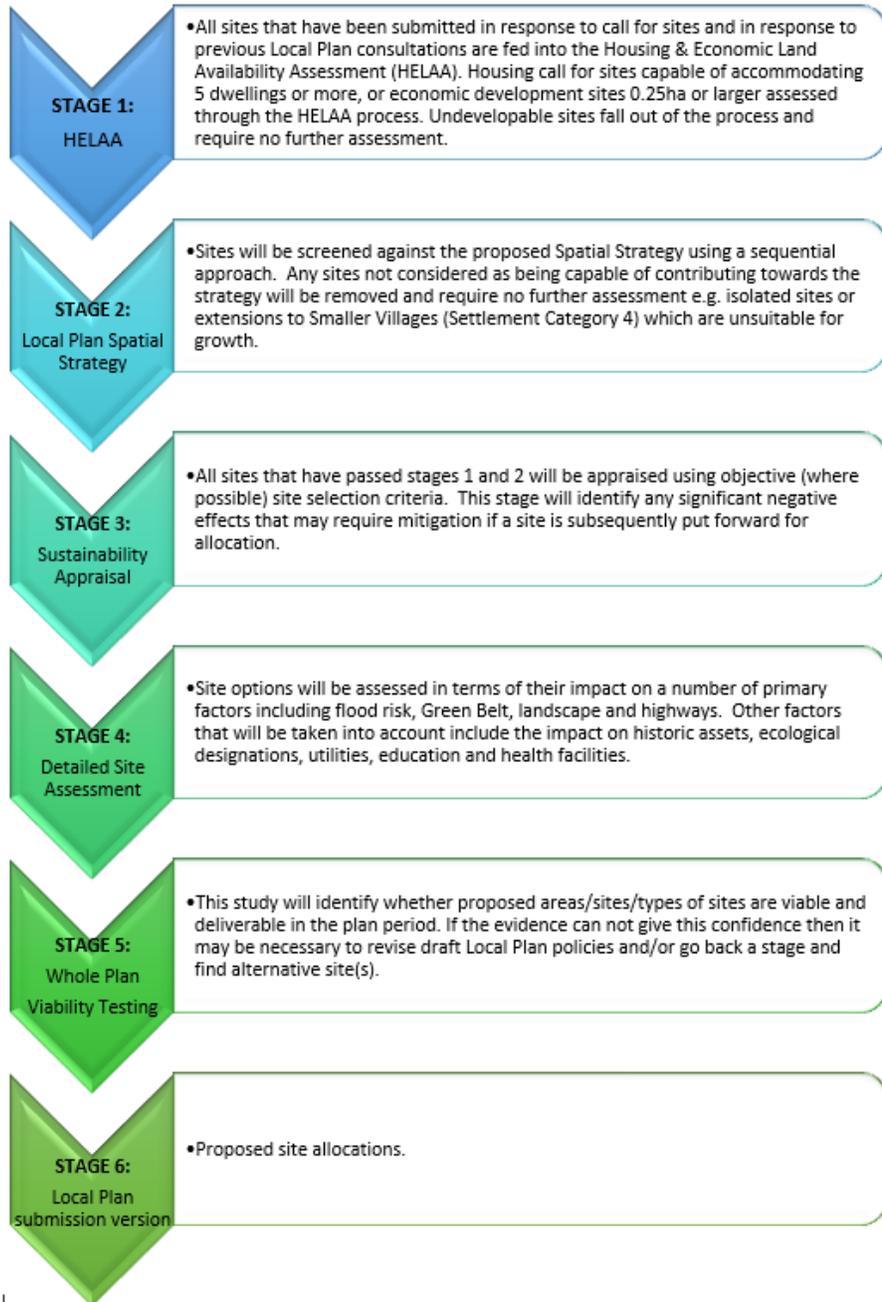
	Rayleigh Road, Brentwood		to site developer interest	
013B	Warley Training Centre, Essex Way, Warle	50	Now included in planning permissions	0
020, 021 & 152	West Horndon Industrial Estates, Childerditch Lane and Station Road, West Horndon [mixed use with a range of supporting local services]	500	Further work on masterplanning has indicated an increased yield	580
039	Westbury Road Car Park, Westbury Road, Brentwood [could retain parking as part of redevelopment]	22	Potential increase in site yield	36
040	Chatham Way/ Crown Street Car Park, Brentwood [could retain parking as part of redevelopment]	26	Potential slight increase in site yield	31
041	Land at Hunter House, Western Road, Brentwood	22	Potential increase in site yield linked to site developer interest	48
042	Land at Bell Mead, Ingatestone	16	Under construction	0
044&178	Land at Priests Lane, Brentwood (to include provision of open space and / or sport facilities for public use)	130	Slight reduction in site yield	95
081	Council Depot, The Drive, Warley	68	Currently exploring higher density scheme options	123
098	Ingleton House, Stock Lane, Ingatestone [redevelopment to include replacement of lost sheltered housing]	10	No net gain forecast in dwelling numbers	0
099	Victoria Court, Victoria Road, Brentwood [redevelopment to include replacement of lost sheltered housing]	40	No net gain forecast in dwelling numbers	0
100	Baytree Centre, Brentwood [residential units provided above retail redevelopment]	200	Reduced site yield without significant area remodeling	65
	<i>Original Sub-Total</i>	<i>1266</i>	<i>Revised Sub-Total</i>	<i>1190</i>
	Brownfield Green Belt Urban Extensions			
010	Sow and Grow Nursery, Ongar Road, Pilgrims Hatch	37	Very slight change in net dwelling yield	38
128	Ingatestone Garden Centre, Roman Road, Ingatestone	60	Potential increase in site yield linked to site developer interest	110
	<i>Original Sub-Total</i>	<i>97</i>	<i>Revised Sub-Total</i>	<i>148</i>
	Strategic Sites			
200	Dunton Hills Garden Village	2500	No change in site yield also options are being explored to speed up delivery rates.	2500
	<i>Original Sub-Total</i>	<i>2500</i>		<i>2500</i>
	Greenfield Green Belt			
022	Land at Honeyplot Lane, Brentwood	250	Lower density options currently being explored.	200
023	Land off Doddinghurst Road, either side of A12, Brentwood	250	Lower density options currently being explored.	200
032	Land east of Nags Head Lane, Brentwood	150	Slightly lowered site yield	125
034,087&235	Officer's Meadow, Shenfield [potential for open space/sport uses and/or Crossrail park and walk facility]	600	Potential lower site yield, but detail subject to masterplan and planning application detail.	500
079A	Land adjacent to Ingatestone by-pass (part bounded by Roman Road)	42	Potential increase in site yield linked to site developer interest	57
	<i>Original Sub-Total</i>	<i>1292</i>	<i>Revised Sub-Total</i>	<i>1082</i>
	TOTAL	5155	TOTAL	4920

29. The combination of reduced dwelling yields and increased OAN partly informed the decision earlier in 2017 for officers to undertake a call for sites and a full update to the current Strategic Housing Land Availability Assessment (SHLAA) (now integrating employment sites and called a 'Housing and Employment Land Availability Assessment' – HELAA), which was last updated in 2011. The local authority needs to be confident that it has explored all reasonable sustainable site options in selecting its final list of preferred site allocations (both housing and employment). Since the Draft Local Plan (2016) consultation, a number of promoted sites have also come forward, which are currently under review. This remains a work in progress as assessment continues using a wide range of emerging evidence base and strategic decisions on future growth are made. A number of issues, constraints and future opportunities are being considered.

Site Assessments

30. The Council received a number of representation on the Draft Local Plan (2016) suggesting that there was a lack of information about the site assessment methodology and overall process. Officers are currently finalising a detailed site assessment methodology paper to sit alongside future site consultation work, but figure 1 below outlines the process adopted to date. This work is based upon best practice and is considered to provide a robust framework for site assessment and selection.

Figure 1: Site Assessment Methodology



Five Year Housing Land Supply

31. In 2016/17 the Council recorded net dwelling completions of 150 units against a rounded OAN of 380 dpa. This was 40% of the annual target and since 2013/14 the number of completions against target is about 35%. In 2016/17 affordable housing completions (22) were running at about 20% of target (107). The current deficit to OAN is 993 dwellings. These latest figures are reported in the 2016/17 authority monitoring report for housing delivery, being brought to Extraordinary Council for approval and publication (15 November 2017).

32. The Housing White Paper, introduced a housing delivery test, looking at the first assessment period of 2014/15 to 2016/17³. Over this three-year period the housing requirement was 1,140 dwellings (based on 380 OAN) whilst housing delivery was 420 dwellings, resulting in under delivery at just 37% of the borough's OAN. Therefore, to accord with the White Paper, from November 2017, as delivery of housing would have fallen below 85% of the housing requirement authorities are expected to plan for a 20% buffer on their five-year land supply.
33. The current 5YHLS statement using the 'Sedgefield approach' is based upon the methodology of including the five-year requirement, plus buffer of 20% and shortfall 'catch-up' within the 5 year forward forecast period results in a 2.6 years of housing supply, well below the expected minimum of 5 years.
34. Looking forward and using the Sedgefield approach it is considered unlikely that the Council will be able to demonstrate a 5YHLS on plan adoption, due to the significant rolling deficit that needs to be delivered within the forecast 5-year delivery period. Work is currently progressing looking at the Liverpool approach to 5 YHLS calculations (backlog / shortfall is applied over the whole plan period) and 'split trajectory' approaches to move the local authority closer to a positive 5 YHLS position. One of the critical factors in this calculation, will be the number and types of allocations which are deliverable within the first five years of the plan. A mixed portfolio of sites, including smaller greenfield / Green Belt sites may form part of this approach, rather than an overreliance on large scale strategic sites with longer delivery lead in periods and complex brownfield sites, potentially requiring remediation and site clearance.
35. A balanced and sustainable approach to housing delivery is required, which supports strong housing supply early and throughout the plan period but also maintains a strong Green Belt and minimises environmental impact. Government is also keen through the Housing White Paper for local authorities to identify smaller housing sites (potentially 10% of sites), which can be delivered quickly and help support local builders.

Brownfield Register

36. Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 requires local planning authorities in England to prepare, maintain and publish registers of previously developed (brownfield) land by 31 December 2017. Officers are currently undertaking work on this register which will be available before the deadline. The register is divided into two parts: part 1 – all brownfield sites appropriate for residential development; and part 2 – those sites granted permission in principle. All brownfield sites that meet the relevant criteria (the land has an area of at least 0.25 ha or is capable of supporting at least five dwellings, the land is suitable and available for residential development and development of the land is achievable), must be entered in Part 1 of brownfield registers.

³ Housing White Paper – Fixing our broken housing market (February 2017)

37. Part 2 of the brownfield register includes those sites granted permission in principle. The Council can trigger a grant of permission in principle by following the required publicity, notification, consultation and technical procedures. The permission in principle consent route is an alternative way of obtaining planning permission which separates the consideration of matters of principle for proposed development from the technical detail of the development. The permission in principle consent route has two stages: the first stage (or permission in principle stage) establishes whether a site is suitable in-principle for residential development (ie development in which the residential use occupies the majority of the floorspace), and the second ('technical details consent') stage is when the detailed development proposals are assessed.⁴

Pulling the Analysis Together

38. Updated work on the OAN has indicated a annual baseline housing need of 380 units per annum, which equates to 7,600 dwellings across the plan period (2013-33). This is a total increase of 360 units from Draft Local Plan baseline in 2016. The increase in need is driven primarily by the upwards market signal adjustment to address considerable local housing affordability issues. With the increase in housing requirements and decrease in yield from the previously considered proposed allocations (reduction by 230 units), this has left officers with the need to consider a wider range of housing site options. At this stage, it would be wise for the Council to consider a mix of sites which deliver in excess of 380 dpa, to provide a degree of flexibility for under-delivery and to test options should the higher standardised methodology figure apply at the time of plan submission. The Council will also need to make sufficient provision to meet specialist accommodation needs, although this will be monitored separately to standard dwelling need. This will require further Regulation 18 consultation on this issue of housing need and site allocations to meet it, as well as other development needs.

ECONOMIC PROSPERITY

Local Plans and Economic Growth

39. The National Planning Policy Framework (NPPF) provides a clear position on the need to build a strong competitive economy. In respect of local plans, it states at paragraph 21 of the guidance that the Plan should *'set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth'*.
40. There is a need to strike the right balance of location and scale of employment sites to ensure integrated strategies with housing and other land uses, support for sustainable travel modes and a portfolio of sites which meet the development needs of business and the wider economy for the 21st Century. The plan has an overriding role to set the key strategic priorities for the area, including policies to deliver the jobs needed, allocation of key employment sites, and infrastructure to support delivery. The plan should aim to improve and build communities, not just be focused on the allocation of land. The NPPF is also clear that planning policies should

⁴ NPPG Paragraph: 001 Reference ID: 58-001-20170728

avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

Brentwood Economic Futures Report: 2013-33

41. Officers commissioned Lichfields in 2017 to prepare an up to date economic evidence report to support the plan. The previous Economic Futures Study covered the period 2015-2030 and therefore required updating to align with the updated Local Plan period – 2013-2033. Work on housing need and employment land need and supply have also been run in parallel to ensure that any cross-over issues are considered and addressed in both the SHMA and Economic Futures update report.
42. The Draft Economic Futures Report is attached as Appendix D to this report, and covers the following main updates:
 - a) defines for the first time Brentwood Borough’s Functional Economic Market Area (FEMA);
 - b) prepares new baseline economic forecasts for the Borough from 2013 to 2033 based upon the Experian employment forecasts as used in the latest SHMA; East of England Forecasting Model (EEFM) employment forecasts; past B class development rates; and an Objectively Assessed Housing Need (OAN) of 380 dwellings per annum.
 - c) provides an assessment of future employment land and site requirements in the context of the updated economic forecasts;
 - d) prepares an analysis of the employment capacity of potential employment sites;
 - e) establishes an employment land trajectory and an updated assessment of the overall employment land and supply balance for the Borough.
43. This report is subject to further reviews and revisions and should be treated as a draft document at this stage.

Brentwood’s Functional Economic Market Area

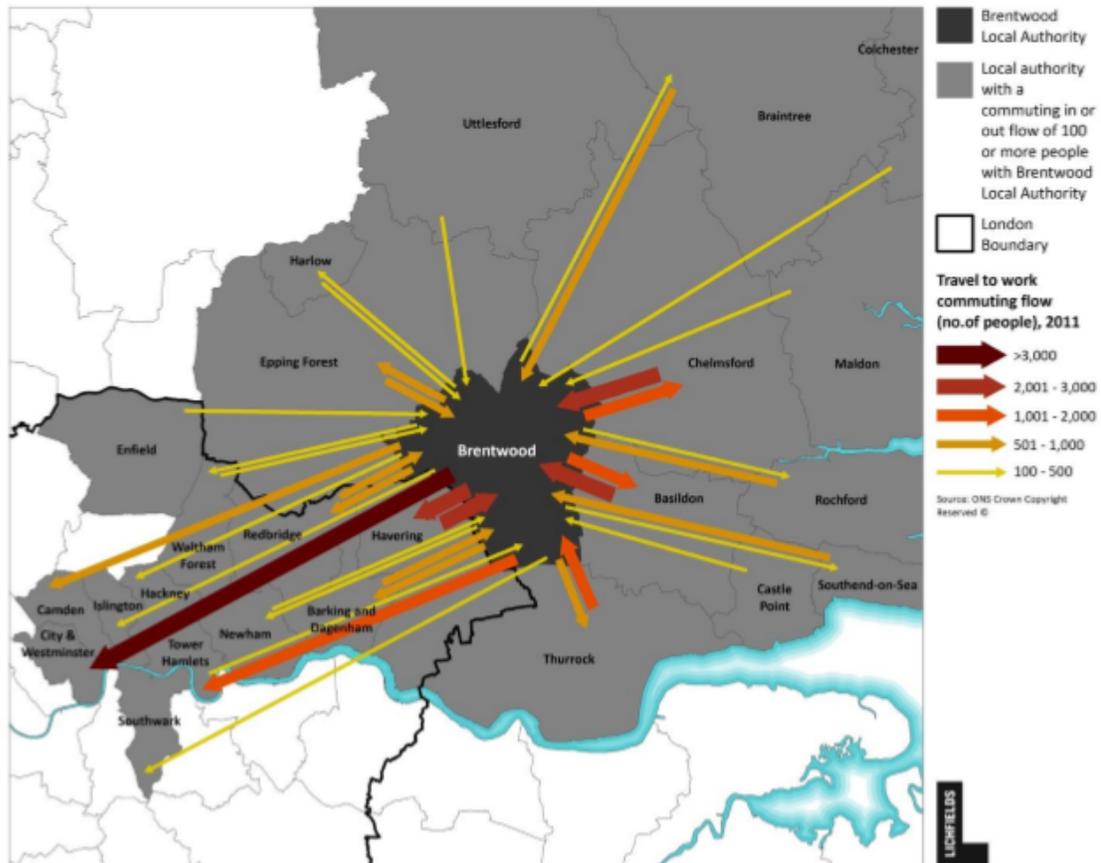
44. National Planning Policy Guidance indicates that the geography of commercial property markets should be thought of in terms of the requirements and location of premises, and the spatial factors used in analysing demand and supply – often referred to as the functional economic market area⁵. Since patterns of economic activity vary from place to place, there is no standard approach to defining a FEMA. However, it is possible to define them taking account of factors, including:
 - a) extent of any Local Enterprise Partnership within the area;
 - b) travel to work areas;
 - c) housing market area;
 - d) flow of goods, services and information within the local economy;
 - e) service market for consumers;

⁵ NPPG - Paragraph: 012 Reference ID: 2a-012-20140306

- f) administrative area;
 - g) catchment areas of facilities providing cultural and social well-being;
 - h) transport network.
45. There are a number of key variables underpinning the Brentwood FEMA, which include the Borough's unique locational advantages including its proximity to major highways including the M25, A12 and A127 corridors and connectivity to railway lines, including the Crossrail Elizabeth Line and C2C Fenchurch Street line from West Horndon. Census 2011 data indicates that Brentwood now forms part of the Chelmsford Travel to Work Area (TTWA) – a move from the Southend and Brentwood TTWA in 2001. In simple terms, TTWAs are a statistical geography created to approximate labour market areas.⁶
46. Located within the extensive South East Local Enterprise Partnership (LEP) area, statistics on Brentwood commuting patterns also indicate that the main destinations for out-commuters include Westminster, the City of London, Chelmsford and Tower Hamlets, while in-commuters mainly come from Basildon, Havering, Chelmsford and Thurrock. The destinations show that Brentwood has strong outward commuting connections with London and much of the Borough's in-commuting workforce comes from the surrounding local authorities. The data shows the Borough is a net exporter of labour, in 2011, with 20,060 commuted out of Brentwood, while 17,750 commuted in from the surrounding local authorities. Brentwood has both strong local and sub-regional commuting patterns, as illustrated in Figure 2 below.

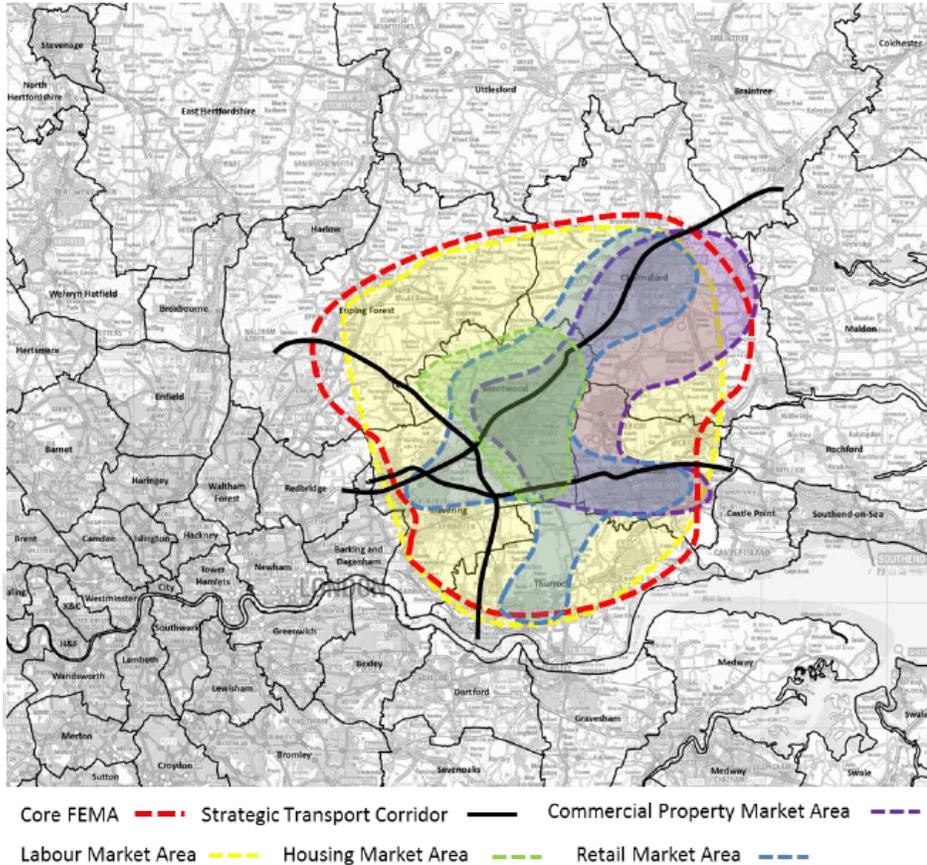
Figure 2: Commuting Patterns (2011 Census)

⁶ The current criteria for defining TTWAs are that at least 75% of the area's resident workforce work in the area and at least 75% of the people who work in the area also live in the area. The area must also have an economically active population of at least 3,500.



47. In establishing the FEMA attention has also been given to the Housing Market Area (HMA) (which is considered self-contained for Brentwood Borough); the flow of goods, services and information and the character of the local commercial market, which suggests that Brentwood has a relatively strong presence in the office market and less so as a location for industrial uses. While it is not an exact science, Figure 3 below attempts to synthesise the various data sources to present an outline Functional Economic Area.

Figure 3: Brentwood Functional Economic Area

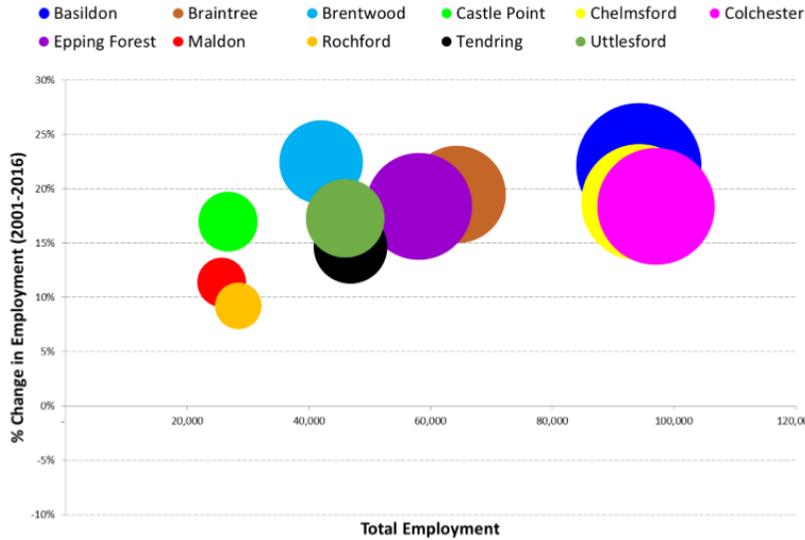


48. At the time of drafting no information has been published on the new South Essex Functional Economic Market Area (covering Basildon, Thurrock and other local authority areas). It is recognised that FEMAs change over time and as part of monitoring the plan it will be useful to consider the extent of change in the Brentwood FEMA as new potential employment allocations, such as Brentwood Enterprise Park, come on stream through the plan period. Or indeed the economic geography changes through developments in neighbouring authorities.

Economic Base and Forecasts

49. At a macro level, Brentwood has witnessed a strong positive percentage change in employment from 2001 to 2016 and is only second to Basildon in Essex for percentage change. This positive position on employment change is illustrated below in Figure 4, although it is also recognised that the total quantum of employment (just over 40,000) is not as high as some other Essex authorities.

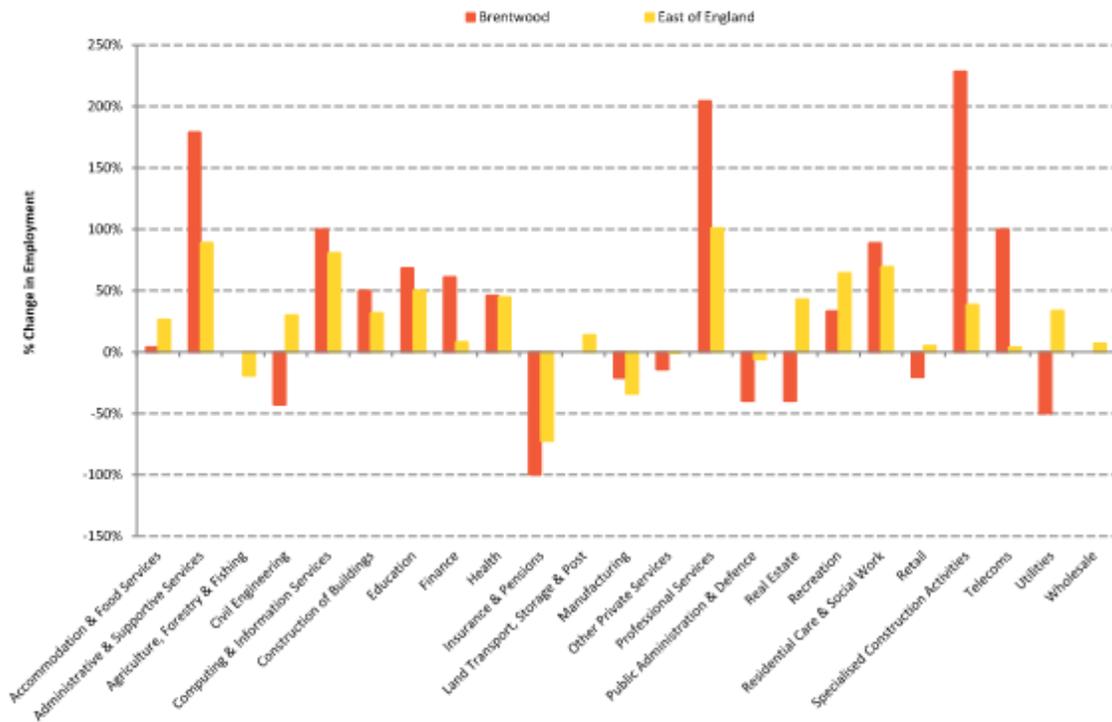
Figure 4: Employment Change 2000-2016



Source: EEFM 2016 Note: Harlow excluded due to negative employment change over the time period.

50. When looking at the changes and trends in the economy over the last 15-20 years, job growth in office-based sectors (B1a/b) have tended to be the main driver of change, with sectors such as specialised construction activities, telecoms and computing and IT outperforming East of England averages for the same period. The highest proportional job losses in Brentwood have been insurance and pensions; utilities; public administration and defence, and real estate. Figure 5 below an overview of sectoral changes from 1997 to 2016.

Figure 5: Change in Sector Employment (1997-2016)



51. Econometrical forecasting is not an exact science (particularly in a period of macro-economic uncertainty) and Lichfields has spread some of the 'risk' of forecasting by using four baseline economic forecasts / scenarios for the Borough from 2013-2033, and undertaken the forecasting in line with national planning policy guidance. The scenarios are:
- a) **Scenario A** - the Experian employment forecasts as used in the latest SHMA;
 - b) **Scenario B**- the East of England Forecasting Model (EEFM) employment forecasts;
 - c) **Scenario C** - an Objectively Assessed Housing Need (OAN) of 380 dwellings per annum; and
 - d) **Scenario D** - past B class development rates.
52. The number of jobs headlines from each of the forecast scenarios are detailed below in Table 3.

Table 3: Economic Forecast Scenarios

Uses	Scenario A - Experian			Scenario B - EEFM			Scenario C – OAN (380)			Scenario D – Past Rates		
	2013	2033	%	2013	2033	%	2013	2033	%	2013	2033	%
Manufacturing (B1c/B2)	3,416	3,640	6.6	3,778	3,513	-7	3,416	3,525	3.2			
Warehousing (B8)	2,119	2,336	10.2	2,068	1,922	-7.1	2,119	2,226	5.0			
Offices (B1a/b)	11,566	15,258	31.9	16,255	19,097	17.5	11,566	13,416	16			
Total B Class Jobs	17,101	21,234	24.2	22,101	24,531	11.0	17,101	19,167	12.1			
Jobs in All Sectors	39,400	48,900	24.1	40,644	45,757	12.6	39,400	44,148	12			
Net Floorspace Forecasts		77,513			28,426			38,556			4,442	
Total Gross Floorspace Forecasts		106,376			54,386			67,418			33,305	
Manufacturing (B1c/B2)		17,635			335			12,202			13,925	
Warehousing (B8)		25,893			2,898			17,706			16,840	
Offices (B1a/b)		62,848			51,153			37,511			2,539	

53. It can be noted in Scenario A (Experian) the overall positive growth forecasts in the model across all B classes, with a total percentage growth of 24.2% between 2013 and 2033. The EEFM is more cautious with reductions in B1c/B2 and B8 sectors while the OAN base model is forecasting growth in each B sector but at a reduced scale to Scenario A. Scenario D (past rates) generally forecasts very low growth rates in total. All scenarios predict an increase in employment land requirements. The above analysis provides officers with a range of job forecasts which can then be converted into net floorspace requirements of between 4,442 m² (Scenario D), 28,426 m² (Scenario B), 38,556 m² for Scenario C and 77,513 m² for Scenario A. Adding a safety allowance for such factors as delays to site delivery and a conversion factor from net to gross floorspace completes the calculation for gross floorspace by scenario requirements as detailed in the final four rows of Table 3.

54. Using a series of standardised site plot ratios it is then possible to calculate the estimated gross employment land requirement (hectares) for the new Local Plan, which is detailed below in Table 4. Total new gross employment land requirements therefore range from 8.1ha to 20.3ha.

Table 4: Gross Employment Land Requirements (2013-33)

Employment Land (ha)				
Uses	Scenario A - Experian	Scenario B - EEFM	Scenario C – OAN (380)	Scenario D – Past rates
Manufacturing (B1c/B2)	4.4	0.1	3.1	3.5
Warehousing (B8)	6.5	0.7	4.4	4.2
Offices (B1a/b)	9.4	7.7	5.6	0.4
	20.3	8.5	13.1	8.1

55. In addition to the forecast gross employment land requirements detailed above, it is important to note that the Council also proposed to allocate a number of existing employment sites in the plan for residential / mixed-use redevelopment. Examples include:

- a) Wates Way Industrial Estate – 0.99ha
- b) All or part of the Council Depot, Warley – 2.98ha
- c) West Horndon Industrial Estate – 16.45ha

56. This loss of existing employment land totals 20.42 ha and should be added to the forecast new employment land requirement.

Employment Land Supply and Balance

57. In the Draft Local Plan (2016) the Council consulted on a range of potential employment allocations including a major new strategic employment site at M25 Junction 29 – Brentwood Enterprise Park. As with the housing sites referred to earlier in the report, officers have undertaken further work on the scale, planning status, capacity and deliverability of potential employment allocations, existing employment sites (not previously allocated) and existing allocated employment land. Table 5 below replicates figure 8.3 from the Draft Local Plan (2016) and adds some additional commentary next to each site.

Table 5: Draft Local Plan (2016) Original Employment Allocations

Site Ref	Site Name	Area (ha)	Comments	Updated Figures
New Employment Land Allocations				
101A	Brentwood Enterprise Park (M25 Junction 29 works)	23.41	The originally assessed developable area for this site was 23.5ha, however further work on site analysis reassessing levels, fill and edges has confirmed some potential for limited additional developable area capacity within the gross site area (35.4ha) for this site. Importantly this limited potential increase (up to 10%) of the developable area continues to maintain a landscape buffer, with no increase in the overall gross site area land take. This position will be reviewed further through ongoing masterplan work and in light of other emerging local plan evidence material including landscape and green belt analysis.	Up to 25.85ha

079C	Land adjacent to Ingatestone bypass (part bounded by Roman Road)	2.06	Slight increase following re-measurement of the site.	2.6ha
12D	Childerditch Industrial Estate (the range)	2.34	No change	2.34ha
200	Dunton Hills Garden Village Strategic Allocation	5.0	Slight increase in capacity.	5.5ha
	<i>Sub Totals:</i>	<i>32.81</i>		<i>36.29</i>
Existing Employment Sites Not Previously Allocated				
101B	Brentwood Enterprise Park (land at Codham Hall)	6.64	No change	6.64
108	The Old Pump Works, Great Warley Street	0.79	No change	0.79
111	Upminster Trading Park	2.6	No change	2.6
228	Peri Site, Warley Street, Great Warley	5.36	No change	5.36
	<i>Sub-Totals:</i>	<i>15.39</i>		<i>15.39</i>
Existing Allocated Employment Land				
110	Town Hall Brentwood	1.09	Permitted development linked to mixed use re-development	0
112	Childerditch Industrial Estate	11.25	No change	11.25
113	Hallsford Bridge Industrial Estate	3.41	No change	3.41
114	Hubert Road Industrial Estate	4.76	Slight reduction in capacity	3.8
045	Hutton Industrial Estate	10.48	No change	10.48
115	Brook Street Employment Area	1.25	No change	1.25
116	Warley Business Park	3.22	No change	3.22
117	Ford Offices, Eagle Way, Warley	5.45	Potential redevelopment for residential uses	0.00
118	BT Offices, London Road, Brentwood	3.5	No change	3.5
119	Canon Offices, London Road, Brentwood	0.45	Slight rounding up on site area	0.5
120	47-57 Crown Street	0.12	Lower than 0.5ha allocation threshold	0
121	Mellon House, Berkley House, and 1-28 Moores Place, Brentwood	0.52	Permitted development for residential in part which reduces remaining employment element to less than allocation threshold of 0.5ha	0
122	1-7 & 16-26 St. Thomas Road, Brentwood	0.22	Lower than 0.5ha allocation threshold	0
123	7-9 Shenfield Road, Brentwood	0.06	Lower than 0.5ha allocation threshold	0
124	38 Ingrave Road, Brentwood (adjacent to town hall)	0.07	Lower than 0.5ha allocation threshold	0
125	North House, Ongar Road, Brentwood	0.18	Lower than 0.5ha allocation threshold	0
	<i>Sub-Totals:</i>	<i>46.03</i>		<i>37.41</i>

58. Further work on the employment allocations considered in 2016, has yielded an increase in potential new employment land of circa 3.48ha (up to 36.29ha with over 70% of growth associated with Brentwood Enterprise Park). In addition to the sites considered as part of the Draft Local Plan (2016) consultation, a small number of new strategically located employment site options are being considered for allocation and are detailed in the Economic Futures Report. These include the further limited extension of the existing employment allocation at Childerditch (2.3ha), additional land near Codham Hall, but not associated with current employment operations (2.8ha); land at East Horndon – to the immediate north west of Dunton Hills Garden Village (5.5ha) and a small potential, allocation north of the A1023 (2.0ha). In total, combining the updated original employment allocations from 2016 (36.29ha) and the new potential allocation sites (12.6ha), this produces a potential new employment allocation of circa 48.89ha. Importantly, further work is ongoing on the detailed assessment of each potential employment site allocation, before the Draft Economic Futures Report can be finalised.

59. The existing employment sites in the Borough which have not historically been specifically allocated for employment uses will be 'regularised' as part of the plan. This list of sites is likely to be extended to include operations within the farm area of Childerditch Industrial Estate (1.9ha) and McColls Headquarters on Ongar Road (1.6ha). As this list of sites contains existing employment uses it does not add to the overall new employment land supply.
60. Since the list of existing allocated land was drafted in 2016, there has been a change in the size or threshold of sites for employment land allocations, which has been directed by the new work by officers on the HELAA. It is proposed that only sites above 0.5ha (gross) will be allocated through the local plan process. This change in methodology partly explains the drop in existing allocated employment land, down from 46.03ha to 37.41ha. Other drivers of change include the potential redevelopment of the Ford site in Warley to residential uses and the introduction within England of permitted development rights for office to residential conversions, which has started to gain some traction in the local commercial market within Brentwood. One future option to protect larger office led employment sites allocations may be to introduce Article 4 directions to remove permitted development rights.
61. Table 6 pulls the analysis together and considers at a macro level the overall employment land need and supply. It illustrates that at a high-level that the level of employment land allocations is broadly sufficient to ensure that the Council meets its overall forecast employment land needs (forecast new needs and losses from allocations and structural change)⁷. It is also recognised that the future restructuring of employment sites and businesses may change floorspace requirements.

Table 6: Employment Land Need and Supply

Land	
New Requirements	
Forecast Requirement for Employment Land (B Class Uses)	8.1ha to 20.3ha
Forecast Loss of Employment Land by Re-allocations for other uses	20.42ha
Forecast Loss of Existing Employment Allocations (above new 0.5ha threshold) through structural change and permitted development	8.62ha
Combined Requirement	37.14ha to 49.34ha
New Supply	
Updated Original Set of Allocations	36.29ha
Potential new allocations (under review)	12.6ha

⁷ It should also be noted that part of the calculation for the forecast reduction in employment land is linked to the new allocation threshold and not necessarily the physical loss of smaller sites.

Combined New Supply	48.89ha
Initial Surplus / Shortfall	-0.45

Qualitative Issues, Market Feedback and Strategy Conclusions

62. It is important to take into account qualitative employment land supply factors as well as quantitative forecasts. The Borough may have sufficient new employment land to meet future requirements based upon the forecast. However, other qualitative factors introduce variables that require more bespoke solutions than just providing an adequate supply of land. Important qualitative factors can include:
- a) The locational needs of different occupiers and employment spaces;
 - b) Gaps in supply of particular land uses;
 - c) The quality of premises and land to attract more occupiers; and
 - d) Improving and modernising existing premises to meet new business needs.
63. The need for providing the right balance of sites in Brentwood is pertinent as the forecast increase in the working-age population will expand the Borough's workforce, which will require a variety of jobs at different skill levels. The employment land report indicates that the employment site mix of b-class uses is broadly able to meet the scenario forecasts.
64. The current list of new employment allocations includes eight sites mainly along the A127. Brentwood Enterprise Park is the largest single allocation, making up over 50% of the total new employment land supply included in the plan. Without Brentwood Enterprise Park coming forward, future employment land supply would be significantly diminished. Consultations with commercial property agents indicate that there is likely demand for new commercial floor space at Brentwood Enterprise Park. Recent developments along the A127 have been successful in drawing in occupiers and the close proximity of Brentwood Enterprise Park to London could make it an attractive location for firms requiring B1c/B2 and B8 floor space to locate.
65. The report also highlights the current accessibility issues with the Brentwood Enterprise Park allocation, in terms of public transport and active travel options. The site is also considered to have a significant build out period and the Council may need to bring forward other allocated employment sites to fill the supply gap that could arise. The report also highlights that the Council should consider how quickly new employment sites could come forward as businesses displaced by housing development (such as West Horndon Industrial Estate) will need new premises at the same time. Otherwise, businesses could relocate from the Borough and shift the centre of economic growth away from Brentwood to neighbouring local authorities. As a high proportion of the new employment land is located at Brentwood Enterprise Park, the Council could consider how it might coordinate delivering the site alongside the redevelopment of existing employment clusters.
66. Also raised in the representations submitted on the Draft Local Plan (2016) is the extent to which the Council will need to provide new employment land on a like for like basis, in consideration of the loss of employment land at West Horndon. Using new employment land

more intensively, rationalising existing sites and how businesses use premises can have an effect on how much land is actually required to support economic growth. These factors mean that the Council will need to plan for a flexible employment land supply.

ENVIRONMENTAL PROTECTION AND ENHANCEMENT

67. Brentwood's natural environment is one of the Borough's greatest assets and provides not only attractive locations for residents and visitors but also helps physically frame Brentwood Town and its Borough of distinct villages. It was recognised in the Draft Local Plan (2016) that a balance needs to be struck between protecting and enhancing our natural assets while also providing scope for growth throughout the plan period.

Green Belt

68. The extent of the Green Belt which totals 89% of the Borough's land mass is often quoted as one of the defining characteristics of the Borough. Green Belt is a policy designation which keeps land permanently open to prevent urban sprawl. The historical development of Brentwood has led to the current central, urban areas of Brentwood and Shenfield, separated by green wedges of Green Belt. The majority of the Borough lies within the Green Belt and comprises a mix of villages (often inset within the Green Belt), residential properties, agricultural land and other uses. This significantly limits land available for development within the Borough and has created the sharp contrast between urban and rural areas with little or no urban fringe.
69. In order for Brentwood Borough to grow economically and to provide sufficient housing, land must be made available for such growth. While brownfield sites within established settlement boundaries can meet some of Brentwood's housing need (approximately 25%), the plan will need to propose growth in the Green Belt to help meet the Borough's objectively assessed housing need and employment land requirements. Being an authority wholly within Green Belt is not sufficient reason alone to not meet local housing requirements.
70. Within the NPPF, the Government places great importance on Green Belts, with their essential characteristics being openness and their permanence. NPPF Paragraph 80 sets out the five key purposes of Green Belt:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land
71. Government is also clear that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended

permanence in the long term, so that they should be capable of enduring beyond the plan period⁸. Importantly, when reviewing Green Belt boundaries, local planning authorities should also take account of the need to promote sustainable patterns of development.

72. When defining new boundaries, local planning authorities should:
- a) ensure consistency with the local plan strategy for meeting identified requirements for sustainable development;
 - b) not include land which it is unnecessary to keep permanently open;
 - c) where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposes the development;
 - e) satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
 - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.⁹
73. Given the growth pressures and physical extent of the Green Belt in the Borough plus consideration of representations raised during the consultation on the Draft Local Plan (2016), officers have commissioned Crestwood Environmental to undertake a full Green Belt review as part the current plan-making process. This builds upon work originally undertaken by Crestwood to independently assess potential housing sites in the Green Belt, submitted as part of the Strategic Housing Land Availability Assessment (SHLAA) from 2013/14. This assessment originally focused upon the relative contribution of the sites to the purposes of the Green Belt and was published alongside other evidence material as part of the Draft Local Plan (2016) consultation.
74. The full Green Belt review will independently assess the Borough-wide Green Belt and integrate the most up to date information on housing and employment sites which have been collated following a call for sites in 2017 to produce a new Housing and Employment Land Availability Assessment (HELAA). The Green Belt review is split into four distinct but inter-related parts:
- a) Part 1: Brentwood Green Belt in Context – High level historic and functional review of the Brentwood Borough within the context of the overall London Metropolitan Green Belt;
 - b) Part 2: Green Belt Parcels Assessment - Borough-wide definition and assessment of Green Belt parcels against the five purposes of the Green Belt noted above;
 - c) Part 3: Sites Assessment (HELAA sites, lesser performing GB parcels and other identified sites) – with the assessment split into two sections, the first considering individual sites

⁸ NPPF Para 83.

⁹ NPPG para 85

and the second reflecting on cumulative impacts of potential allocations (clustered sites along settlement edges and corridors);

- d) Part 4: Partial review of Settlement Boundaries and Green Belt edge – focused review of settlement boundaries using study evidence.
75. This report includes the Part 1 study in full and a brief summary of Part 2. For the first time the Part 2 study will include a Borough wide map of Green Belt ‘parcels’ including their assessment against the five purposes of the Green Belt. An early working draft copy of this Borough wide parcel map is included with the Part 2 summary paper. Part 1 and Part 2 (summary) of the Green Belt review can be viewed under Appendices E-G.
76. In addition to sites submitted by site promoters and landowners during the HELAA and call for site process, officers are currently reviewing a small number of Green Belt parcels which have been evaluated as contributing less to the purposes of the Green Belt. Further work is also planned to take place with neighbouring authorities through Duty to Co-operate in defining the ‘outer edge’ of a number of parcels which lie towards the Borough’s administrative boundary.

Landscape Studies

77. Often confused with Green Belt assessments, landscape studies have their own distinct methodology and content, mainly structured around assessment guidance established in conjunction with the Landscape Institute. Crestwood has been commissioned to provide an assessment of landscape capacity to accommodate growth to help inform local plan site selections. This study is detailed and wide-ranging and is running in parallel to the detailed site assessments currently being undertaken by Council officers. This work will be published alongside the next Regulation 18 consultation.

Green Infrastructure

78. The Council published a strategic green infrastructure document alongside the Draft Local Plan (2016). Following this publication, additional work is being undertaken by officers on creating a comprehensive Green Infrastructure database to facilitate detailed GIS mapping and provide a classification of different types of Green Infrastructure to inform policy drafting and site development considerations. The Green Infrastructure database also has a cross-over themes with the ongoing update to the Sport and Recreation Study, which is progressing with Sport England and Active Essex. Both studies will be published alongside the next Regulation 18 consultation.
79. The work undertaken by Essex Ecology Services Ltd on Local Wildlife sites in December 2012 was very comprehensive. Discussions are ongoing with Essex Local Wildlife Trust over the extent of any update to this piece of work. It is generally recognised that 2017 has been a challenging year for site surveying, due in part to the extremely dry spring and summer weather conditions which has limited the ability to undertake comprehensive grassland surveys. While there may not be any significant updates required in relation to woodland sites, grasslands can be more sensitive to change.

Flood Risk and Water Infrastructure

80. The Council has commissioned an update to the Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) (2011) in order to comprehensively assess water supply, water quality, watercourses, ecology, sewerage and flooding. This is being undertaken in accordance with the Environment Agency's water cycle study guidance and new flood assessment modelling levels.
81. The Water Cycle Study will bring together the necessary information and views of the relevant stakeholders to identify constraints to, and opportunities for, the strategic delivery of water resources, water treatment, maintenance and improvement of water quality, flood risk management, integrated water management and sustainable drainage systems for Brentwood. The overall aim of the study is to identify a programme of water services infrastructure and other related measures needed to support planned development in the Borough up to 2033. This information will feed into the development of the Infrastructure Delivery Plan and the Brentwood Plan.
82. Updates on the SFRA and WCS will be available at the next formal stage of consultation on the plan.

TRANSPORT, MOVEMENT AND CONNECTIVITY

83. While Brentwood Borough is relatively small in geographical terms, the Borough is located only 30 minutes by train to London and has some major transport infrastructure within its administrative boundaries, including the M25 (J.28 and J.29), A12 and A127 road transport corridors and four railway stations, including two new Crossrail (Elizabeth Line) stations (Shenfield and Brentwood). At peak commute times and around school-run times the built-up area is often heavily congested with traffic. Due to the nature of the current built form, there are considered to be limited options to introduce major new road infrastructure or increase junction capacity within the Brentwood Urban Area. Highways England has recently consulted upon improving the operation of J.28 M25 (Brook Street roundabout) with a proposed scheme, which may lead to some improvements in reducing congestion at this critical junction with the A12. In addition, the Lower Thames Crossing, a new road connection and tunnel, has recently been confirmed. Although this does not physically affect the administrative boundary of the Borough the wider highway capacity benefits and new links will both benefit and impact local roads.
84. The Draft Local Plan (2016) was accompanied by a 'Development Options – Highways Modelling' report by Peter Brett Associates (PBA), who were commissioned to assess the impact of site allocation options over the coming years. PBA adopted a hybrid model approach where trip generation and distribution for development options were estimated utilising spreadsheets for trip generation and Omnitrans for trip distribution. This produced traffic flows for both the baseline and the option tests, which then fed into the junction modelling. The methodology for the model was first set out in 2014 and discussed with both Essex County Council and Highways England.

85. The model and outputs have been subject to extensive and detailed local plan representations in 2016 by a number of parties including the County Council and Highways England, and since the publication of the Draft Plan a number of meetings have taken place to progress the transport work programme including attempting to agree a baseline traffic model with its various technical assumptions.
86. Traffic and transport modelling are technically challenging and often costly areas of work for local authorities without the traditional inhouse expertise of highways authorities. Officers have recently taken the opportunity to review progress on this work stream and appoint a transport expert to expediate the traffic modelling and also refocus the range and ambition for transport planning for Brentwood. The Borough needs a 'step change' in sustainable transport provision to ensure that new developments such as Dunton Hills Garden Village and Brentwood Enterprise Park are well connected to transport means other than private car. The garden village also provides a clear opportunity to prioritise walking and cycling within its movement framework to ensure that opportunities for health and wellbeing are central to the masterplan for this new settlement.
87. In other locations across the Borough there are opportunities to support active travel and public transport provision, with clear strategies required to address pollution in air quality management areas and create the right transport and movement strategy for Brentwood over the next 20 years. This will include looking at future infrastructure provision on housing and employment sites (such as improved cycling, walking and public transport infrastructure) and ensuring that development schemes are future proofed for the move away from combustion engine technology to electric and hybrid vehicles.
88. Further updates on the transport work programme and technical reporting will be available at the next formal stage of consultation on the plan.

OTHER EVIDENCE MATERIAL

Sport and Recreation Study

89. As part of the evidence base for the plan a needs assessment was completed in August 2016 to identify current and future provision required to meet the sports facility needs of Borough residents. This work was completed with a view towards applying the needs assessment, as advocated by Sport England (Assessing Needs and Opportunities Guidance (2014)), to form the basis of producing an authority wide facility strategy for indoor and outdoor sport.
90. However, subsequent evidence (Draft Value for Money Review and Management Options Appraisal (2017)) brought to the Council's attention Sport England's advice that further work be completed to provide the Council with a more robust evidence base in which to inform future decision on new facilities. As such 4Global, in partnership with Strategic Leisure Limited and Active Essex, were commissioned by the Council in May 2017, to update the 2016 Assessment

by producing an Indoor Facility Strategy and Playing Pitch Strategy with sign off by Sport England. The projected timeline for completion of this work is:

- a) Indoor Facility Strategy - Final report to be issued December 2017
- b) Playing Pitch Strategy - Final report to be issued February 2018

91. The completion of the playing pitch evaluation is determined by established guidance on the right time of year to assess the condition of sports pitches.

Infrastructure Delivery Plan (IDP)

92. A full Infrastructure Delivery Plan (IDP) is being developed to accompany the local plan through to 2033. Work started on the IDP in July 2016 and a draft IDP will be prepared to accompany the next formal stage of consultation on the plan. The IDP is a working document and is also being developed as a web-resource, similar to the Government's approach to planning practice guidance.

93. The development of the IDP is closely aligned to final site allocations, but it is possible to highlight a number of key emerging strategic priorities and themes. The strategic infrastructure priorities include:

- a) **Delivering the right infrastructure at the right time** - The planning system has an important role to play in co-ordinating development and ensuring that the provision of infrastructure to support new housing and employment development such as schools, health facilities and transport is delivered at an appropriate scale and in a timely manner.
- b) **Enhancing green infrastructure Networks** - The Borough is fortunate in having a rich tapestry of natural assets, including two County Parks, 15 SSSI units, and 147 Local Wildlife Sites. However, there are still substantial opportunities to improve the quality, range and connectiveness of the Borough's Green Infrastructure.
- c) **Supporting high quality design** - Promoting a sense of place is considered a key local priority in infrastructure planning – helping minimise the impact of new infrastructure on local character and enhancing areas through innovative design which positively responds to local heritage and environments.
- d) **Supporting strategic growth through sustainable infrastructure planning** – The plan proposes significant growth within its main urban centre and along transport corridors. There will be a need to fully integrate strategic growth sites (such as Dunton Hills and Brentwood Enterprise Park) with a network of supporting infrastructure including public transport and active travel. Individual strategic development sites will also need to be supported by tailored infrastructure plans.
- e) **Forward thinking and innovation-led** – thinking ahead to Brentwood in 2040/50 and the changing dynamics of technological innovation and infrastructure, from smart homes, e-vehicles to the use of meta data to better understand work, movement and society.

94. In terms of more specific detail, Table 7 below indicates emerging key infrastructure issues and potential local priorities.

Table 7: Emerging Infrastructure Issues and Priorities

Infrastructure Theme	Commentary
Physical Infrastructure	
Public Realm Improvements	<p>Brentwood Town - enhancements to key sites in line with the emerging Town Centre Design Plan and Guide.</p> <p>Shenfield – enhancement to the railway station forecourt and surrounds.</p> <p>West Horndon - Redevelopment of industrial estate creating new village facilities and better connections to the Railway Station.</p>
Transport – work stream under review	<p>Rail Infrastructure - Accessibility and public realm improvements for both Brentwood and Shenfield Stations. New bus interchange facilities at Brentwood and Shenfield Stations. Cycle parking improvements at Brentwood and Shenfield Station. Improved car park connections at Shenfield. New taxi rank facilities at Brentwood and Shenfield stations. Baby change facilities and other internal customer facility improvements at Shenfield Station. Internal customer facility improvements at West Horndon Station. Platform access improvements at West Horndon. Additional cycle parking facilities and new bus interchange facilities at West Horndon Station. Additional car parking capacity at West Horndon Station. Increased gateline at West Horndon. Internal customer facility improvements at Ingatestone Station. Impaired mobility set down area. Taxi and bus facilities at the station. Car park layout and surfacing improvements.</p> <p>Bus Infrastructure - Brentwood Urban Area – Strategic Allocations - Increased frequency and re-routed provision to include new development locations. Brentwood and Shenfield Railway Station Transport Hubs - Interchange facilities and revised timetabling to take into consideration Crossrail investment. Requirement to increase times of services and improve Shenfield Station services to link across the Borough and beyond. South East of the Borough (West Horndon and Dunton Hills) - Significantly enhanced bus services and new bus infrastructure to connect West Dunton to Brentwood and other locations (including West Horndon Railway) and inter-connect the new settlement with Brentwood Borough public transport and active travel infrastructure and beyond. South of the Borough (Brentwood Enterprise Park) - New bus infrastructure to support workers accessing the development and linked through to other public transport / active travel options. Infrastructure connections / investment may also be required outside the Borough to potential worker hotspot locations. North West of the Borough (villages and rural areas) - Evaluate scope for further community transport infrastructure to enhance bus services. Sunday and Evening Services - Evaluate demand and options for Sunday and Evening services (potentially seasonal) to support evening economy and visitor / tourist sectors.</p> <p>Cycling – implementation of cycling and walking infrastructure</p>

	<p>priorities as detailed in emerging cycling action plan.</p> <p>Highways – Brentwood Urban Area - Junction improvements: - Wilson's Corner Junction A1023/A128, Junction High Street A1023, King's Road B185 and Kings Road B185 High Street to Brentwood Rail Station; strategic sites and new junction access points and highways infrastructure; J.28 M25 and Brook Street access improvements; A127 and Dunton Hills – new bridge infrastructure</p> <p>Transport innovation – community transport and car clubs</p>
Energy	District heating options to be explored and renewable energy innovation on all strategic scale sites, including Dunton Hills.
Water and Drainage	SUDS and comprehensive water management strategies for West Horndon Industrial Estate, Brentwood Town Centre brownfield sites, major urban extensions and strategic sites including Brentwood Enterprise Park and Dunton Hills. Water recycling centre and foul sewage network Infrastructure and/or treatment upgrades required to serve a number of potential sites or diversion of assets may be required.
Waste	<p>Composting facilities – there is no major specialist facility in the Borough</p> <p>Commercial waste recycling – while there are a number of commercial collection services and waste transfer sites, there is potentially a deficit in an easy to access 'turn up' or permit access site for businesses depositing small levels of commercial waste. The Borough continues to witness regular fly-tipping and this may help alleviate some of these problems.</p> <ul style="list-style-type: none"> • Potential lack of innovative thinking in end solutions for waste – recognising the increasing limitations of land fill. Opportunities to explore incineration, and waste to energy thermal and non-thermal technologies at a local level. • Growth and capacity constraints for current RCHW operations.
Telecommunications	The main gaps in broadband coverage include: Rural north and north east of the Borough; Rural north west of the Borough; West of A12 to the south west of the Brentwood Urban Area; Rural east / south east of the Borough; Extreme south of the Borough. Mobile coverage - weaker mobile coverage is concentrated within the Borough's rural or green field areas
Social and Community Infrastructure	
Education – under review	Additional early years provision linked to key development areas, including major employment developments. Additional primary school provision required in a number of locations across the borough – particular hotspots include Brentwood Urban Area, Shenfield and West Horndon. Potential pressures emerging on secondary school provision within the Brentwood Urban Area. Expansion of specialist school provision also identified as a priority, especially for 6 th form provision. Provision of full education infrastructure for Dunton Hills, to potentially include new all-through school academy, additional primary school provision and multiple early years provision.
Health – under review	Further enhancement of the range of services delivered at Brentwood Community Hospital to potentially include GP services . Effectively manage the additional pressure on GP services within Brentwood Town. There may also be a requirement for further

	healthcare infrastructure resources to support services within Shenfield and Doddinghurst. Investment in new health facilities within the south of the borough is a major priority to support growth at West Horndon and Dunton Hills. Potential additional capacity required in dentist practices providing services for NHS clients. Potential investment in care support services.
Sport – under review	Updated evidence is currently in development – potential need for a range of indoor and outdoor facilities across the Borough. Dunton Hills will also need to be supported by new sports infrastructure possibly linked to new school provision.
Community Services and Facilities – under review	Maximise use of existing community assets, including community halls. Increased provision of youth services and facilities. Potential need for new multi-use community facilities (potentially integrating library facilities), particularly linked to strategic growth areas including Dunton Hills – could be provided at co-hosted locations (schools / healthcare sites). Potential need for investment in social services, voluntary sector and carer support network.
Rural Services and Facilities - under review	Strategic priorities identified through the Essex Rural Partnership – supporting prosperity, well-being, connection (particularly transportation and IT) and innovation. Parish plan and parish council priorities to be detailed. Support for retaining local villages services, including post offices and rural bus connections.
Culture and Heritage	Conservation area improvement plans and local listings support programme. Maximising heritage interpretation and protection and where possible integration of heritage features across key development areas.
Emergency Services – under review	Discussions on-going linked to service restructuring.
Green Infrastructure	
Green Infrastructure (GI) – under review	Multiple improvement options across public parks and gardens, ecological assets, green and blue corridors, outdoor sports areas, amenity spaces, allotments, cemeteries and churchyards. Cope for significant enhancement of GI connected to A127 corridor growth sites including Dunton Hills.

SPATIAL STRATEGY

95. The Draft Local Plan (2016) set out a clear spatial vision and strategy for the Borough, with an emphasis upon protecting and enhancing local character while fostering sustainable communities by concentrating new development on land within the Borough’s Transport Corridors. Brentwood and Shenfield were the main focus for development in the A12 Corridor supported by two strategic allocations in the A127 Corridor, bringing forward new homes, businesses and employment.
96. The current work on the plan continues to support corridor led growth but also more closely links the current settlement hierarchy to the spatial strategy to ensure that opportunities for sustainable development are maximised. The strategy also continues to focus upon the

Borough of villages concept, with strategic housing growth to include Dunton Hills Garden Village.

Delivering Sustainable Development

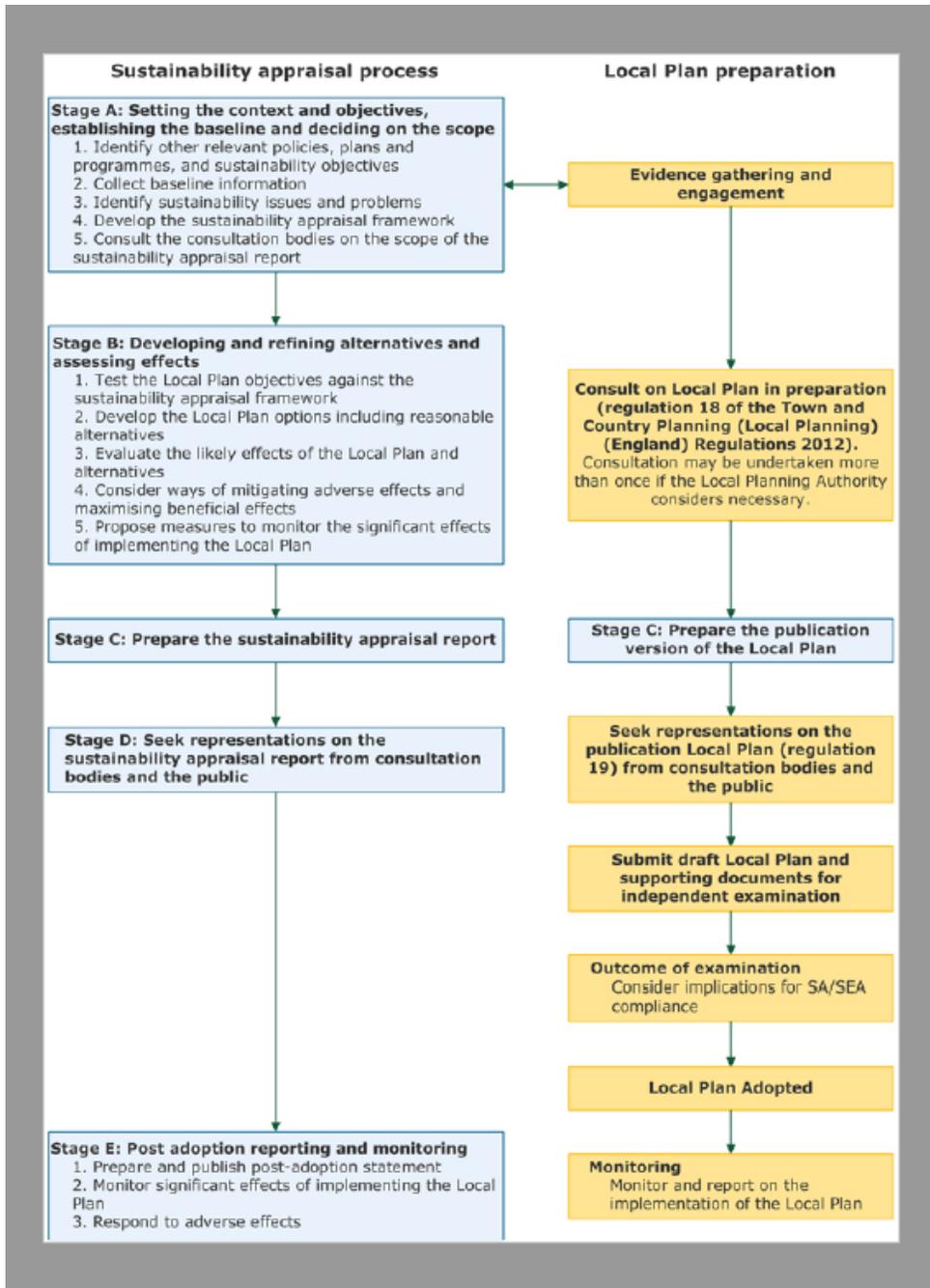
97. One of the key evidence documents to accompany the local plan is the sustainability appraisal. A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan.¹⁰ Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.¹¹ The SA allows the Council to consider opportunities through plan-making to contribute towards improving environmental, social and economic conditions in the local area and identifying and mitigating the impact of the plan and related development proposals. The SA is generally applied as an iterative learning process running parallel to the plan as it progresses.
98. AECOM has been working closely with the Council on the production of the SA and recent work has concentrated upon more closely aligning the spatial strategy to the current settlement hierarchy – which is the Council’s currently established breakdown of settlements across the Borough with an assessment of their sustainability in terms of services, facilities and features. Representations were raised during the consultation on the plan in 2016 questioning how the spatial strategy had been developed by the Council and what underpinned the selection of the location for strategic growth options, including Dunton Hills Garden Village. The SA work programme includes an enhanced focus on the current settlement hierarchy and a clearer narrative on the development and assessment of reasonable growth alternatives (and indeed what it not considered reasonable alternatives) in arriving at the currently proposed spatial strategy.
99. The general process for undertaking a Sustainability Appraisal is detailed below in Figure 6.¹²

Figure 6: Sustainability Appraisal Process

¹⁰ Under the Planning and Compulsory Purchase Act 2004, SA must be undertaken for all Development Plan Documents (DPDs). The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC, which was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.

¹¹ NPPG Paragraph: 001 Reference ID: 11-001-20140306

¹² Figure reproduced from Strategic Environmental Assessment and Sustainability Appraisal Guidance (February 2015) - Paragraph: 013 Reference ID: 11-013-20140306



Sequential Land Use and Settlement Hierarchy

100. The proposed spatial strategy continues to focus upon the sequential use of land, which prioritises using brownfield land first and then considers growth in settlements in terms of their relative sustainability linked to services and facilities. Table 8, below sets out the framework to this approach, which in essence combines elements of Figure 5.4 (Sequential Selection of Sites) in the Draft Local Plan (2016) with the original 'Hierarchy of Place' analysis. The table includes information on the currently estimated dwelling numbers and percentage of need being met through the various steps linked to the settlement hierarchy. It can be noted that prior to allocations approximately 25% of the objectively assessed housing need (OAHN) has been met by completions and forecast non-allocation 'pipeline supply', including planning permissions (based upon an OAHN of 380 dwellings per annum). The table also includes a column for completing information on meeting specialist accommodation needs which is in addition to the OAHN. Finally, the table includes a provisional assessment of the percentage of OAHN met should the Government's standardised methodology to calculating housing need be applied.
101. At the end of the table 8 is can also be noted that prior to the allocation of an agreed strategic growth option (Dunton Hills), there is a dwelling need remaining of circa 1800 units (with an OAHN of 380 dpa) or 3312 units based upon the new standardised housing need methodology, as interpreted on current information. Options are currently being considered for how Dunton Hills Garden Village can deliver additional homes at an accelerated rate. Figures in table 8 are provisional and draft as work continues to fully understand capacity and delivery rates.

Table 8: Integrated Sequential Land Use and Settlement Hierarchy (provisional figures)

Step 1	Dwelling Completions, Planning Permissions and Windfall Allowance	Approximate Percentage of OAHN Met (Running Total) (380 dpa) (7600)	Standardised Methodology (454 dpa) (9080)	Specialist Accommodation	Estimated Headline Dwellings (Running Total)
	<ul style="list-style-type: none"> Development completed from 1st April 2013 to 31st March 2017. Development considered 'permitted' (planning permissions, resolved to grant applications and prior approvals) but not yet completed at 31st March 2017, including non-implementation discount of 10%. Forecast allowance for completions and permissions from 1st April 2017 to 31st March 2018. Windfall allowance for small sites (1-4 dwellings) - Small scale development within development boundaries and brownfield sites. (13 years at 39 units) 				527
					917 – 10% = 825
					120
					507
		26.04%	21.80%		1979
	Remaining to allocate (OAHN at 380 dwellings per annum)				5621
Step 2	Consider sites within the context of the settlement hierarchy which details settlements in terms of their relative sustainability in terms of services and facilities.	Approximate Percentage of OAHN Met (Running Total)			
	Settlement Hierarchy 1 – Main Town – Brentwood Urban Area, made up of connected local centres such as Brentwood, Shenfield, Hutton, Hutton, Warley, Brook Street and Pilgrims Hatch <ul style="list-style-type: none"> Prioritise brownfield sites within established settlement boundaries Consider non- 				1285+108

	Settlement Hierarchy 2 – Village Service Centres – Ingatestone	brownfield land within established settlement boundaries				9
	Settlement Hierarchy 3 – Larger Villages – Blackmore, Doddinghurst, Herongate, Ingrave, Kelvedon Hatch, Mountnessing and West Horndon					580
	Running Total		52.12%	43.62%		1982
Step 3	Development needs cannot be fully met through steps 1 + 2 outlined above - consideration is given to whether neighbouring Local Authorities can accommodate our remaining growth in non Green Belt locations		Approximate Percentage of OAHN Met (Running Total)			
	Neighbouring Authorities and Non-Green Belt Areas	a) Basildon b) Thurrock c) Chelmsford d) Epping Forest e) Havering				0
	Running Total		52.12%	43.62%		3961
Step 4	Development needs cannot be fully met through Steps 1-3 (within Brentwood non-Green Belt areas and no options are available with neighbouring authorities to take our remaining housing need in non-Green Belt locations). Need to consider appropriate sustainable locations for growth outside of development boundaries and in the Green Belt.		Approximate Percentage of OAHN Met (Running Total)			
	Settlement Hierarchy 1 – Main Town – Brentwood Urban Area , made up of connected local centres such as Brentwood, Shenfield, Hutton, Hutton, Warley, Brook Street and Pilgrims Hatch	Small, medium and large sites on the edge of the urban area which: a) do not have significant development constraints; b) can provide high quality development c) minimise development impact and / or can provide significant infrastructure benefits d) are deliverable and e) can provide a defensible redefined Green Belt Boundary.				1374
	Running Total		70.20%	58.76%		5335
Step 5	Development needs cannot be fully met by consideration of growth options outlined above in steps 1-4.		Approximate Percentage of OAHN Met (Running Total)			
	Settlement Hierarchy 2 – Village Service Centres - Ingatestone	Small to medium sites on the edge of the village service centre which: a) do not have significant development constraints; b) can provide high quality development c) minimise development impact and / or can provide significant infrastructure benefits				257

		d) are deliverable and e) can provide a defensible redefined Green Belt Boundary.				
			73.58%	61.59%		5592
Step 6	Development needs cannot be fully met by consideration of growth options outlined above in steps 1-5.		Approximate Percentage of OAHN Met (Running Total)			
	Settlement Hierarchy 3 – Larger Villages – Blackmore, Doddinghurst, Herongate, Ingrave, Kelvedon Hatch, Mountnessing and West Horndon	Small sites on the edge of the village service centre which: a) do not have significant development constraints; b) can provide high quality development c) minimise development impact and / or can provide significant infrastructure benefits d) are deliverable and e) can provide a defensible redefined Green Belt Boundary.				176
	Running Total		75.90%	63.52%		5768
Step 7	Development needs cannot be fully met by consideration of growth options outlined above in steps 1-6. Need to consider additional strategic growth options and establish a set of reasonable alternatives.		Approximate Percentage of OAHN Met (Running Total)			
	Various strategic growth options considered with allocation taken forward in Step 8.					
			75.90%	63.52%		5768
	Prior to allocating strategic growth option – short by		1832 dwellings	3312 dwellings		
Step 8	Establish a set of reasonable alternatives. Development needs cannot be met by North Brentwood extension which is not considered deliverable / developable within the plan period. The West Horndon extension provides only for a limited level of growth (1000 units maximum) and below the housing target. Dunton Hills provides for the full level of growth within the plan period and a sustainable location for growth.					
	Review of Reasonable Alternatives a) North of Brentwood/Shenfield (Urban Extension) b) West Horndon (Village Extension) c) Dunton Hills (New Settlement)					
	Dunton Hills Allocation		3500	3500		9268
	Dwellings above (+) / below (-) OAHN		+1668 (+22%)	+188 (+2%)		

103. This integrated approach to sequential land Use and the settlement hierarchy, includes a new limited housing focus within and on the edge of larger village settlements. The larger villages in the Borough are generally served by local shopping and school facilities, community and health services, local jobs and a variable bus services. These larger villages provide the opportunity to release small edge of settlement sites to support limited housing growth. This approach will

help improve the range and size of the local housing stock (including affordable housing) and support and retain local services and facilities (core sustainable development issues).

104. The release of small edge of village Green Belt sites are also forecast to positively support the early delivery of housing in the Borough (assisting housing delivery within the first five years of the plan) and due to their modest physical scale, provide opportunities for smaller potentially local builders / businesses - which is a Government ambition towards a more inclusive and locally responsive approach to housing construction.
105. The updated approach also includes a re-calculated contribution and classification of windfall. The large windfall allowance highlighted in the Draft Local Plan (2016) (circa 1,000 units) has been reduced to a small windfall allowance consisting of 1-4 dwellings only (about 39 units a year). This helps avoid double counting windfalls and allocations (as it is below the site allocation threshold of 5 dwellings) and aligns with further research by officers on the nature and extent of historic windfall patterns. This approach also supports a plan-led strategy to housing through allocations rather than an over-reliance on large windfall delivery which could be difficult to defend at public examination. In pragmatic terms, and although difficult to forecast, large windfalls (5 dwellings and over) will continue to come forward in Brentwood and will continue to support housing supply, but they will not be relied upon to boost housing delivery figures.
106. The position in table 8 displays provisional site delivery rates against meeting OAHN only. If Government guidance is followed regarding the need to show supply in addition to OAHN (10% to 20%+) for flexibility, and security in case certain sites do not come forward, the Council may need to identify more sites and/or homes.

Reviewing Reasonable Alternatives

107. The Draft Local Plan Interim SA (February 2016) was published at the last formal stage of public consultation on the local plan. This document set out a staged or stepped process to develop a set of reasonable alternative spatial allocations. This approach is set out below in Table 9, (columns 1 and 2), with some links back to the settlement hierarchy table set out above (table 8). Table 9 also includes (column 4) an update to the development of the reasonable alternatives work programme, which reflects current work with AECOM on the next update to the SA.

Table 9: Development of Reasonable Alternatives

Interim SA Report (2016)	Detail	Links to Updated SA Approach	Current SA Work Programme
Stage 1 - Establish how much land needs to be allocated	OAHN minus completions, permissions and windfall	Step 1 in Table 8 above.	Finalising completions, permissions and windfall data.
Stage 2 – Establish the ‘givens’ for site allocations	Brownfield land first	Step 2 in Table 8 above.	Brownfield land first focus across all sustainable locations as defined by the settlement hierarchy. Also

			review non-Brownfield site release options within the boundaries of established sustainable settlement locations.
	Residual housing needs (about 50% of housing need outstanding) must be met through a combination of A12 urban extensions and one or more strategic allocations	Part of Steps 3-6 in Table 8 above	After exploring all non-Green Belt site options (including with neighbouring authorities), review settlement edge green belt site options aligned to the existing settlement hierarchy (Brentwood Urban Area, Village Service Centre and Larger Villages)
	The Council determined the preferred locations for A12 urban extension allocations	Part of Steps 4-6 in Table 8 above	Focus extended beyond A12 focus to larger villages.
			OAHN still not met, with circa 1800 min remaining dwellings to be allocated.
Stage 3 – Establish the variables or strategic choices	Two strategic choices – 1) the approach to strategic allocation(s) and 2) the windfall assumption.	Stage superseded by updated position on windfall	
Stage 4 – Establish a set of strategic site allocation options	<p>Option 1 - homes at Dunton Hills Garden Village</p> <p>Option 2 - homes through an extension of West Horndon</p> <p>Option 3 - homes at land to the north of Brentwood (this would encompass one of the preferred A12 urban extension allocations).</p> <p>Option 4 - homes at land to the East of Running Waters, Hutton</p> <p>Option 5 - homes at Dunton Hills Garden Village and land north of Brentwood</p> <p>Option 6 - homes through an extension of West Horndon and at land north of Brentwood</p>	Link to Stage 7 in Table 8.	Further narrative is being drafted on strategic site options and clear separation into discounted and reasonable alternatives. Approach also informed by representations made to the Draft Local Plan (2016). Strategic Options include: Options 1 & 2 - Development of West Brentwood and Pilgrims Hatch (Discounted) Option 3 – Expansion of Shenfield (Discounted) Option 4 - Land north East of Hutton (Discounted); Option 5 – Land to the east of Running Waters (Discounted); Option 6 – Land West of Warley (Discounted); Option 8 – Land to the north of Brentwood (not discounted) Option 9 - Development and expansion of Ingatestone (Discounted) Option 10 – Development to encompass northern villages (Discounted); Option 11 – Development to further expand West Horndon (not discounted), Option 12 Dunton Hill

			New Settlement (not discounted). Option 13 – Hybrid Options (not discounted)
Stage 5 – Establish a final set of reasonable alternatives	As above options but with ‘givens’ added.		Reasonable alternatives established for further review through the SA: Land north of Brentwood Expansion of West Horndon Dunton Hills new settlement Hybrid options

Strategic Options Assessment and Finalising Reasonable Alternatives

108. A strategic options assessment as part of the SA considers the housing target and broad spatial priorities/options, examining each ‘spatial tier’ in turn (e.g. brownfield, urban greenfield, urban area and village extensions, strategic sites), concluding on whether the approach for each tier should be taken as a given/constant or a choice/variable, for the purposes of establishing reasonable alternatives. The next step is then to identify the options for each variable, and then the final step is to pull all the options together into a single set of district-wide reasonable alternatives. The development of reasonable alternatives is underpinned by sustainable development considerations and informed by top down growth demands and bottom up site considerations.
109. It can be noted from Table 9 that a wide range of strategic housing options have been considered as part of the SA and plan-making process to identify and finalise a list of reasonable alternatives. These reasonable alternatives will be set out in further detail in the upcoming SA to accompany the next stage of local plan consultation. It is important to note that the consideration of alternatives is required in order to make sound decisions about growth locations and importantly ensure that the eventual plan put forward to the Secretary of State is positively prepared, justified and will delivery sustainable development. Reasonable alternatives are just that – reasonable in planning terms but an alternative option to the proposed/chosen strategy, and therefore not selected for development.

STRATEGIC GROWTH

110. The overall strategic approach to delivering growth is focused upon the Brentwood Urban Area and the Council’s approach to maximising brownfield site delivery options through the new Brentwood Town Centre Design Plan and corporate asset development programme, as well as a strong focus upon growth within the A127 corridor through the delivery of both large-scale housing and employment opportunities. This is all consistent with a commitment to best use brownfield land and ensure growth is consistent with the Borough’s village character.

A127 Growth Corridor

111. The nature of historic development patterns in the Borough has seen Brentwood Town, it's surrounding urban areas such as Shenfield, and villages like Ingatestone, fill much of the space contained within the A12 Corridor. Development opportunities exist to maximise brownfield land and create sustainable urban extensions that will provide for just over half of the Borough's development needs. The Brentwood urban area, Mountnessing and Ingatestone are settlements along the A12 Corridor that are inset within the wider Green Belt, the combination of these settlements make-up a considerable proportion of the land within the Corridor area.
112. By contrast, the A127 Corridor in the south of the Borough is largely undeveloped, other than the small village of West Horndon, which is inset within the wider Green Belt. As indicated in the spatial strategy for the plan, this area provides an opportunity to deliver new growth that meets the Borough's remaining needs in sustainable locations and consistent with local character – our "borough of villages".
113. Development is being considered of various scales within a relatively short distance along the A127 corridor, including a 3,500 dwelling garden settlement (2,500 dwellings within the plan period as proposed in 2016, with ongoing work to consider whether accelerated additional growth can be brought forward) with a new village service centre and employment land at Dunton Hills, extensions to Childerditch Industrial Estate and potential new employment allocations at East Horndon and a major strategic employment site at M25 Junction 29 (Brentwood Enterprise Park). The distance from the M25 to the A127 Junction for the Ford Dunton Technical Centre is about 4.5 miles. In addition, development is being planned across the wider area outside Brentwood Borough in adjoining authorities, such as Thurrock, Basildon Borough and the London Borough of Havering. How future development is planned across this wider area is equally important.
114. The prospect of growth in previously undeveloped locations presents the need to consider how new development relates to its surroundings – whether other new development, existing communities, or the wider surrounding environment. Specific new plan evidence is required to consider the development capacity of the Borough's A127 Corridor. Development locations are being assessed within the area (including masterplanning for Dunton Hills Garden Village) and this work will join up thinking so far as to how proposals relate to their wider surroundings.
115. This new evidence will inform both the strategic content and policy wording for the plan covering this part of the Borough and eventually either the production of an Urban Design Framework or Supplementary Planning Document to provide additional planning policy direction. The current study area measures about 14 square miles and is detailed below in Figure 7.

Figure 7: A127 Corridor Study Area



The key outputs from this work will include:

- a) **Services and facilities** - Benchmarking and better understanding how the local area currently works in terms of connections to key transport nodes (including West Horndon Station), schooling and access to services. What options are there to effectively and efficiently plan for new infrastructure to support the various developments including (but not exclusively) public transport, active travel options, social infrastructure and education?
- b) **Movement and Highways** - The A127 is a strong transport corridor but also a problematic 'barrier' to connectivity north and south - what options exist to improve linkages - north / south, including active travel and habitat corridors? What practical improvements can be made to the A127 within the lifespan of the plan and what is the cumulative impact of development and key mitigation measures?
- c) **Green Infrastructure** - Plan effectively for green infrastructure networks and key habitat corridors at a strategic level and at a scale significantly larger than individual development sites.
- d) **Landscape and Green Belt** - While much of the development options are quite distinct there is a need to potentially reinforce the visual separation of the new growth areas

and support the integration of high quality landscape features and ensure the Green Belt boundaries are clearly defined and will endure beyond the plan period.

- e) **Heritage** – consider heritage connections, impacts and mitigation in the round through the study area.
 - f) **Planning and design** - Framework for informing key planning and design principles for the corridor area. What is the appropriate scale and massing of development to strike the right balance between creating places and environments of distinct character and enhancing the quality of the wider landscape?
 - g) **Site masterplanning** - Links and relationship between sites and what are the implications for detailed masterplanning?
 - h) **Long term growth options** – what are the opportunities for the next plan period and what are the implications now for safeguarding Green Belt land and comprehensive planning?
 - i) **Duty to Co-operate** - Focused joint working with duty to cooperate partners and site sponsors on site planning and infrastructure development.
 - j) **Community Engagement** – mechanisms and opportunities for community engagement, including links to neighbourhood and community planning.
116. It is intended to finalise the key aspects of the consultant brief through a workshop with duty to co-operate partners towards the end of November 2017 and commission the work early January 2018 to be complete by the end of March 2018. This will be a critical piece to inform the local plan.

Dunton Hills Garden Village

117. The proposed Dunton Hills Garden Village is the most significant housing-led development scheme in the emerging plan, and is a once in a lifetime opportunity to create a new settlement, which not only delivers substantial housing growth, but will be a major new service centre in its own right, with shops, facilities, schools and employment opportunities. The inhouse project team for Dunton Hills is also clear on the need for this new village to be a ‘class leader’ in design terms and ensure the social, environmental and economic principles of garden villages are fully applied.
118. Since the official ‘Garden Village’ status was announced in January 2017, officers have been working with the site promoter (CEG), the Homes and Communities Agency (HCA) and Design Council Cobe to explore how the garden village principles could be practically applied to the development of a masterplan for the site. Government has provided some financial assistance to the Council to assist with supporting the development of the masterplan and to progress other related workstreams.
119. The key current work streams led by the project team include:
- a) **Engraining Garden Village Principles and Masterplanning** – portfolio of projects focused around fully aligning garden village principles to the core of the development.

Masterplanning process externally facilitated by Design Council Cabe. Key projects include: a full masterplan development programme, design competition for the new Dunton Hills Academy and specialist landscape support on considering development within the site ridgeline. The main focus for this work programme is upon place-making and design quality, although there is a clear brief upon maximising housing options and challenging assumptions about physical restrictions on growth (onsite infrastructure such as electricity pylons and avoiding development on the site ridgeline). A programme of scheme viability analysis is running parallel to the design work.

- b) **Embedding heritage** – the historic Dunton Hills farmhouse and barns are at the centre of the site and provide connections to the wider historic landscape. There are clear opportunities to ensure that this important asset plays a key role in connecting the site to its past and creating opportunities in the future for conservation and potentially informing some of the potential physical character of the new settlement. Key projects include: a farmstead heritage assessment, the development of an innovative Heritage Partnership Agreement, Conservation Management Plan with cost programme and site interpretation programme. Again, the focus is upon high quality place-making and creating a sense of distinctiveness.
- c) **Demographics, Intelligence and Market Positioning** – broadly better understanding the surrounding communities and potential new residents on the site. Key role in informing housing types and mixes of development, plus identifying emerging and unidentified to date infrastructure requirements. Key projects: adaption and modification of existing forecasting population tools and commissioning of new Community profiling tools. Focus around the right housing in the right place.
- d) **Governance, Taking a Stake and Creating Community** – currently research and scoping reports on improving the current project management, considering options for local governance, including parish council arrangements and trust structures and options for the local authority to directly support housing delivery. The outputs from this research may play a key role in speeding housing delivery, particularly if the local authority takes a collaborative or direct stake in affordable housing delivery.
- e) **Future Casting and Technological Innovation** – key theme on technological innovation and thinking about the village of the future now. Key projects include: research papers on smart infrastructure (on-site and within properties); the application of learning from the key sectors actively engaged in future casting (such as retail and entertainment) to the future direction of new settlements and importantly how can the scheme benefit from off-site production and modular construction. The implementation of offsite produced housing units would potentially significantly increase delivery rates for Dunton Hills.
- f) **Housing and New Communities – Adapting for Change and Sustainability** – wide ranging work programme concentrating upon fully understanding the wider spatial context to Dunton Hills; getting ‘under the skin’ of affordable housing options, understanding the importance of adaptable housing design and engraining eco-design and high quality green infrastructure, including native planting and ecology promotion within the development. Mixture of research, case studies and commissions. Outputs focused upon high quality place-making and innovative design.

- g) **Thinking Radically and Future Proofing – Transport and Movement** – generally challenging the traditional movement hierarchy and ensuring active travel, public transport and new technology (e-charging, driverless vehicle infrastructure etc) is central to the scheme. Range of research and commissions plus the appointment of a transport expert / specialist within the project team. Drive for the work programme around distinctive place-making, public health and sustainable development.
- h) **People, Skills and Future Work** – there are real opportunities through Dunton Hills to improve the skills, prospects and opportunities of many people. There are also clear opportunities to engage the residents of tomorrow through effective engagement with local schools. The current projects under this work programme include: research papers on education engagement; project champions and lifestyle changers; scoping study on skills, training and apprenticeships and the research on the changing nature of workplaces. The focus is very much upon leaving a positive legacy for Dunton Hills.
- i) **Creating a Culture of Innovation** – it is one of our key cross cutting themes. How can we create the right environment to encourage innovation and creative thinking about place-making, overcoming challenges, challenging assumptions and creating an exciting vibrant community? Key current projects include: DH Network 24 – online and face-to face networking group; Pop-hub project / community hub and research linking early community engagement to place ownership and community structures. Real focus around quality of place.
- j) **Working smart** – it is often easy to overlook ensuring that the project team has the right resources to work effectively and efficiently and create an on-line vision and community for Dunton Hills. Deliverables include new website and enhanced software / hardware.

120. The project team is starting to roll out an engagement programme across Brentwood’s communities, stakeholders and with neighbouring areas. This is including a schools’ engagement programme - thinking about Dunton Hills in 2050 and the types of issues planners need to think about in creating new communities. A major stakeholder event is also programmed to kick start detailed project input. Work has also progressed on the format to a new project specific website. The current work programme on school engagement could be referred to Government by the HCA as good practice. Attention is also being given to formalising the governance structure for the project and considering options for wider community engagement.

Brentwood Enterprise Park

121. As noted above in the section on employment land supply, a new enterprise park at M25 Junction 29 is being promoted through the plan process by St. Modwen PLC on a 35ha site (gross). A masterplan is being developed for the site which deliver over 2000 jobs (excluding construction) and include land for a range of traditional b class employment uses plus ancillary uses. Officers are keen to ensure that the site is developed to a high design standard and becomes well connected through public transport and active infrastructure to minimise unnecessary private car journeys.

DUTY TO CO-OPERATE

122. The Council has and continues to engage constructively with other local planning authorities and other public bodies on the preparation of the Local Plan following the approach set out in the NPPF. A summary of the mechanisms for and evidence of cooperation and engagement is set out below in Table 10.

Table 10: Duty to Cooperate – Engagement Undertaken

Cross Boundary Consultee	How We Are Cooperating so far	Strategic Issue
Basildon	<p>Joint consultation on an urban extension to Basildon – Dunton Hills Garden Suburb. Basildon politically withdrew support.</p> <p>Thames Gateway South Essex SHMA 12/03/2015 23/09/2015</p> <p>EPOA Officer Meetings Bi-monthly (5-6 per annum)</p> <p>Officer meetings 14/12/2016</p> <p>SHMA Part 2 workshop 15/03/2017</p> <p>Jointly commissioned Green Corridor evidence: March 2017 onwards.</p> <p>South Essex Strategic Planning Officers Group (from Oct 2017) (Includes Basildon; Thurrock; Rochford; Southend; Castle Point and ECC).</p>	<p>DHGV development impacts</p> <p>Green Infrastructure & landscape</p> <p>Highways</p> <p>Education</p> <p>Brentwood Draft Local Plan (2016) consultation response requested Brentwood borough considers taking part of G&T but not followed up after this.</p> <p>No formal request for Brentwood to take housing from South Essex SHMA.</p>
Thurrock	<p>EPOA Officer Meetings Bi-monthly (5-6 per annum)</p> <p>Officer Meetings 05/10/2016 03/05/2017</p> <p>SHMA Part 2 workshop 15/03/2017</p> <p>Green Belt 26/11/2015</p>	<p>2016 objected to development proposals in A127 corridor</p> <p>Position changing but way forward for Thurrock unknown.</p> <p>No formal request for Brentwood to take housing from Thurrock SHMA.</p>

LB Havering	<p>Duty to Cooperate Events 02/08/2016 28/11/2016 22/03/2017</p> <p>SHMA Part 2 workshop 15/03/2017</p> <p>A127 Growth Corridor Aspirations & Coordination of work 27/04/2017</p>	<p>Highways – impacts of development on A127.</p> <p>No formal request for Brentwood to take housing from Havering.</p>
Epping Forest	<p>EFDC Co-op Officer Working Group monthly (Includes Epping Forest DC; Harlow; Uttlesford; East Herts; and: Chelmsford; Broxbourne; Redbridge; Enfield; Waltham Forest, ECC; FLA; TFL);</p> <p>13/04/2017 18/05/2017</p> <p>SHMA Part 2 workshop 15/03/2017</p>	<p>Currently no identified issues.</p> <p>Brentwood on-going consideration process of potential impact of new development on Epping Forest SPA/SAP through HRA</p> <p>No formal request for Brentwood to take housing from Havering.</p>
Chelmsford	<p>EPOA Officer Meetings</p> <p>Bi-monthly (5-6 per annum)</p> <p>SHMA Part 2 workshop 15/03/2017</p>	<p>Currently no identified issues</p> <p>No formal request for Brentwood to take housing from Havering.</p>
Parish Councils	<p>Parish Council Workshop – IDP 17/11/2016</p> <p>Meeting Neighbourhood Plan Parishes for updates. Attendance at joint Parish Council group meetings.</p>	<p>DHGV is in a Neighbourhood Plan area and the Parish Council strongly object to it and the concept of new development in the area.</p>
Essex County Council	<p>EPOA Officer Meetings</p> <p>Bi-monthly (5-6 per annum)</p> <p>SHMA Part 2 workshop 15/03/2017</p> <p>Separate Issue Meetings:</p> <p>Highways (see below)</p> <p>IDP research 2016-2017 – Education; Early Years facilities, highways; surface water flooding and alleviation projects, broadband</p>	<p>Highway impacts</p> <p>Education infrastructure need</p>

	infrastructure	
South East LEP	IDP research 2016-2017	Plan delivery
DCLG	Dunton Hills Garden Village expression of interest Summer 2016 Implementation meeting 29/03/2017	N/A
GLA	A127 Growth Corridor Aspirations & Coordination of work 27/04/2017	N/A
Environment Agency	IDP research 2016-2017	Flood
Natural England	IDP research 2016-2017	Biodiversity
Water Companies	IDP research 2016-2017	Flooding, sewage, drainage and water treatment
Train Companies	IDP research 2016-2017	Railway and transport infrastructure
Civil Aviation Authority	IDP research 2016-2017	N/A
Diocese	IDP research 2016-2017	Community facilities
Historic England	IDP research 2016-2017	Historic assets and their settings
The Homes and Community Agency (HCA)	IDP research 2016-2017 Dunton Hills Garden Village – 20/04/2017 and subsequent 2017 meetings/events	DHGV Housing
Care Commissioning Group (s)	IDP research 2016-2017 Healthcare summit with Basildon and NHS England 19/01/17	Health
Office of Rail Regulation	IDP research 2016-2017	
ECC highway authority	IDP research 2016-2017 Highways modelling – methodology discussion A127 Growth Corridor Aspirations & Coordination of work 27/04/2017 IDP research 2016-2017 Dunton Hills Garden Suburb Dunton Hills Garden Village Site specific discussion including	Highways

	pre-app Preferred Site discussion	
Highways England	Highways modelling – methodology discussion	Highways
TfL highway authority	IDP research 2016-2017 A127 Growth Corridor Aspirations & Coordination of work 27/04/2017	Highways
South Essex Authorities Group / South Essex 2050 initiative	Fortnightly meetings focusing upon strategic growth issues – leadership provided by Leaders and chief execs of each authority	Strategic growth strategy
Marine Management Organisation (MMO)	Consultation via Local Plan Reg 18 only. Not applicable.	N/A

PROJECT MANAGEMENT

123. At an officer level the management of the plan includes quarterly roundtable ‘conference’ sessions with legal counsel on key issues. The sessions also actively involve the plan’s key consultants on various evidence work streams.
124. The Local Development Plan (LDP) Members Working Group (MWG) meets to discuss elements of the plan-making process. This was recently added to with the creation of Scrutiny working groups to scrutinise certain aspects of key corporate projects, including the local plan. Meetings for 2017/18 have now been diarised with the group membership being similar for both the LDP MWG and Scrutiny LDP MWG, albeit with separate agendas and approved scopes.
125. On strategic projects officers have regular discussions and work session with the Homes and Communities Agency on the development and delivery of Dunton Hills and a project delivery group which consists of the site promoter (CEG), various professional support team and dedicated resources from the Council. A formal governance structure for Dunton Hills is shortly to be agreed and implemented.

NEXT STEPS

126. Following completion of outstanding evidence to inform the next stage of the plan, most significantly the Housing and Employment Land Availability Assessment (HELAA) and the latest stage of site assessment work, further consultation on Regulation 18 stage is expected on the local plan in early 2018 (January). Depending on the level of response and full consideration of this, it is anticipated that the Council would be able to consult on Regulation 19 stage (pre-submission consultation) in summer 2018. Following this the plan will be submitted to the Secretary of State for an examination in public to be held by the Planning Inspectorate.

127. A timetable will be prepared taking into account related documents, such as work on supplementary planning documents (or similar); the Town Centre project (Brentwood Town Centre Design Guide and future development briefs); and other dependencies such as locally prepared Neighbourhood Plans.

ADDITIONAL APPENDICES

Appendix B: Strategic Housing Market Assessment Summary, PBA (September 2017)

Appendix C: Gypsy and Traveller Accommodation Assessment (Draft), ORS (November 2017)

Appendix D: Brentwood Economic Futures 2013-2033 – Final Draft Report, Lichfields (November 2017)

Appendices E, F & G: Green Belt Review Working Drafts – Part 1 and 2 (Summary) plus map of parcels, Crestwood Environmental (November 2017)

Brentwood Borough Council



Strategic Housing Market Assessment Summary

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September 2017

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1 INTRODUCTION

- 1.1 The Objectively Assessed Housing Needs Study was commissioned by Brentwood Borough Council to provide an objective assessment of housing need (OAN). Together with the Part 2 SHMA (affordable housing needs) it covers the full objectively assessed housing need for Brentwood Borough.
- 1.2 This note provides a summary of the findings.

Method

- 1.3 The note is prepared applying the current (October 2017) Planning Policy Guidance (PPG). This is likely to be revised shortly and result in a much higher level of housing need (the 'standardised method'). This new approach is currently subject to consultation.
- 1.4 Should the consultation proceed, with no further changes, then this suggests a need for 454 dpa in the Borough¹.

Geography

- 1.5 Here we consider the need number for Brentwood. Earlier work² identified Brentwood as a reasonable 'housing market area' (HMA)
- 1.6 While this conclusion, that Brentwood is a pragmatic HMA, can still be supported the Council should not overlook the fact that there are links with neighbouring housing market areas. These links need to be managed through the Duty to cooperate.

Limitations

- 1.7 One significant complication with assessing housing need is the reliance on the official population and household projections. These are exceptionally unstable because they reflect short term (5 year) domestic migration flows. For small authorities, such as Brentwood, these can result in variances +/- 100 dpa between data releases. This volatility flies in the face of the objective to inform long term housing needs for a long term development plan. So planning needs to try and pre-empt data and interpret it with plan period in mind.
- 1.8 Planning guidance recognises the limitations in data and stresses that setting OAN is not an exact science. Inspectors also recognise that many of the steps followed to arrive at the OAN, following the Planning Guidance, are not exclusive but overlap; an uplift in housing to meet a concern about a lack of affordability in the market can also, for example, address any concern that households don't form as readily as some may like.

¹ It is unclear whether this figure relates to Dwellings or Households. If households an additional small adjustment (upwards) for vacant homes may be required.

² Brentwood SHMA – DCA (2013)

- 1.9 Setting the OAN enquires a degree of option and, unfortunately for Councils, in the current absence of a standardised method options will naturally vary between practitioners, plan supports and objectors.

2 ARRIVING AT THE OAN

Identifying the starting point

- 2.1 Guidance requires Councils to start their assessment of need from the latest set of Population and Household projections. These are released every two years but it is also possible to pre-empt the official projections using demographic modelling by drawing on the 'raw data'. It is also established practice, supported in the guidance, to test alternative projection periods.
- 2.2 At the time of writing the latest (2014 based) official projections suggest 348 dpa. But indications are that the next round of projections (2016 based projections, due summer 2018) will be substantially lower at around 280 dpa³. This is based on PBA projecting the 2011-16 population growth (PBA Trends 11-16 projection).
- 2.3 Looking at longer term trends also suggest a lower level of need. Modelling from the GLA shows that both 10 and 15 year projections are much closer to where we expect the 2016 based projections to fall than the 2014 based projections (i.e. closer to the PBA 11-16 Trends Projection).
- 2.4 For Brentwood, and the emerging plan, this means that we have two possible 'starting points' – the official 2014 based projections but also evidence to suggest they (the official projections) may fall. We also have evidence which suggests the 2014 based projections are unusually high. And so an alternative projection, reflecting what we expect to see in the next round of official projections should be given significant weight.
- 2.5 Given the plan is still in preparation, and most likely to be submitted following the release of the 2016 based projections more weight should be afforded to the emerging number. (although the standardised method – discussed below – may be adopted before this point).

Uplifting the demographic starting point

- 2.6 Government policy and guidance states that in many areas simply meeting demographic need (the official household projections) may not be enough to meet the demand for housing in area; meeting the starting point number may not provide the homes people want and can afford to buy.
- 2.7 Policy also reflects the fact that in many areas past under-provision of homes has distorted the market, possibly leading to house price increases above those we would have expected in similar areas.
- 2.8 Following the guidance an uplift can be justified for a number of reasons but most commonly for adverse 'market signals' (house price increases above comparators and a lack of affordability in the market) and/or for economic needs.

³ This varies slightly depending on the period used – either 2013/33 or 2013/37. But the difference is not significant (+/- 3 dpa)

- 2.9 In Brentwood evidence suggests an uplift if warranted; more homes are needed than the demographic projection suggests. Brentwood is clearly an expensive Borough with a demand for housing. Further, the economic evidence available today, and affordable need evidence, would suggest the OAN needs to be set around or above the current CLG 2014 projections.

Setting the Objectively Assessed Needs Figure

- 2.10 To what extent the numbers are uplifted is a matter of opinion. In this case our opinion is that a positive approach is needed because pressure, at examination and from objectors to plans is (almost) always upwards. Further Councils should take a positive approach to addressing the national need for housing. Balancing against this the requirement, set out in guidance, that any uplift should be 'reasonable'.
- 2.11 Under the PPG the highest reasonable uplift is around +30% of the demographic need. Applied to the 2011 -16 projection this results in a OAN of around 364 dpa⁴.
- 2.12 We also suggest a small additional increase to allow for the risk that our estimate of the 2016 based projections is slightly too low and to ensure that the OAN exceeds the current (2014 based) projections; with some flexibility.
- 2.13 This suggests the Council should plan for an OAN of 380 dpa.

Standardised Method

- 2.14 As noted in the introduction; the OAN discussed above (and any other PPG compliant OAN) may be superseded by the 'standardised method'. As a consultation this new number (454 dpa; based on the 2014 household projections with an adjustment reflecting the lack of affordability in Brentwood and 40% cap applied) carries no weight at the moment. But may come into effect as soon as April 2018.

⁴ 2013/37. The 2013/33 number is slightly lower at 356 dpa.

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Brentwood Gypsy and Traveller Accommodation Assessment



**Need Summary Report
October 2017**



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1. Introduction

- 1.1 The primary objective of the Brentwood Gypsy and Traveller Accommodation Assessment (GTAA) Need Summary is to provide a robust revised assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation for the period 2016-2033.
- 1.2 The primary reason for completing the update was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes. The key change that was made was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA (see Para 1.6 for the full definition).
- 1.3 The study provides a robust evidence base to enable the Council to assess and meet the needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, and the Housing and Planning Act (2016). It also provides the evidence base which can be used to support Local Plan policies and development management.
- 1.4 The Brentwood GTAA is part of a wider study that covers the whole of Essex, together with Southend-on-Sea and Thurrock. Due to the complexity of this wider study, the overall Essex GTAA Report has not yet been completed. However the fieldwork has been completed for Brentwood and a final assessment of need has been undertaken. Therefore the purpose of this Need Summary is to provide the Council with a summary of the levels of need for the period 2016-2033 to provide evidence for its Local Plan.
- 1.5 It is anticipated that the final reporting framework for the wider Essex GTAA will comprise an Essex GTAA Methodology Report; individual GTAA Need Summary Reports for each of the 14 local authorities; and an Essex GTAA Summary Report that will bring together all over the final outcomes from each local authority and provide figures for Essex as a whole, as well as providing strategic recommendations on issues such as transit need.
- 1.6 The baseline date for the study is **September 2016**.

The Planning Definition in PPTS (2015)

- 1.7 For the purposes of the planning system the definition of a Gypsy, Traveller and Travelling Showperson was changed in PPTS (2015). The planning definition is set out in Annex 1 and states that:

For the purposes of this planning policy “gypsies and travellers” means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) Whether they previously led a nomadic habit of life.*
- b) The reasons for ceasing their nomadic habit of life.*
- c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

For the purposes of this planning policy, “travelling showpeople” means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

- 1.8 The key change that was made to both definitions was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

Definition of Travelling

- 1.9 One of the most important questions that GTAA’s will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term ‘*nomadic*’ as well as other travelling characteristics.
- 1.10 **R v South Hams District Council (1994)** – defined Gypsies as “*persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)*” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- 1.11 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- 1.12 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- 1.13 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family’s recently approved Gypsy site sought judicial review of the local authority’s decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

- ^{1.14} That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- ^{1.15} **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- ^{1.16} The implication of these rulings in terms of applying the planning definition is that it will **only include those who travel (or have ceased to travel temporarily) for work purposes and in doing so stay away from their usual place of residence**. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will **not cover** those who commute to work daily from a permanent place of residence.
- ^{1.17} It will also be the case that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. that the household unit would be defined as travelling under the planning definition.
- ^{1.18} Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational or health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have travelled in the past. In addition households may also have to demonstrate that they plan to travel again in the future.
- ^{1.19} This approach was endorsed by a Planning Inspector in a recent Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267). A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

2. Methodology

Background

- 2.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible GTAAs. This has been updated in light of the introduction of the PPG in 2014, changes to PPTS in 2015 and the Housing and Planning Act (2016), as well as responding to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 2.2 PPTS (2015) contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.
- 2.3 The approach currently used by ORS was considered in April 2016 by the Planning Inspector for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy who concluded:

'The methodology behind this assessment included undertaking a full demographic study of all occupied pitches, interviewing Gypsy and Traveller households, including those living in bricks and mortar accommodation, and considering the implications of the new Government policy. On the evidence before me, I am satisfied that the assessment has been appropriately carried out, and there is no reason for me to dispute the figures.'

- 2.4 The stages of the methodology that was used to complete this study are set out below. More information on each stage will be provided in the full GTAA Report for the Essex Planning Officers Group.

Desk-Based Review

- 2.5 ORS collated a range of secondary data that was used to support the study. This included:
- » Census data.
 - » Site records.
 - » Caravan counts.
 - » Records of unauthorised sites/encampments.
 - » Information on planning applications/appeals.
 - » Existing Needs Assessments and other relevant local studies.
 - » Existing national and local policy

Survey of Travelling Communities

- 2.6 Through the desk-based research, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all

occupied pitches and plots. In order to gather robust information to use to assess households against the planning definition of a Traveller. Multiple visits were made to households where it was not possible to conduct an interview because they were not in or not available.

- 2.7 Our experience suggests that an attempt to interview households on all pitches is more robust, as opposed to a sample based approach which often leads to an under-estimate of need - an approach which is regularly challenged by the Planning Inspectorate and at planning appeals.
- 2.8 ORS worked closely with the Council to ensure that the interviews collected all the necessary information to support the study. The household interview questions that were used have been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the current planning definition.
- 2.9 All pitches and plots were visited by members of our dedicated team of experienced interviewers who work on GTAA studies across England and Wales. They conducted semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics (to meet the new requirements in PPTS). Interviewers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.
- 2.10 They also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- 2.11 Where it was not possible to undertake an interview, staff sought to capture as much information as possible about each pitch from sources including neighbouring residents and site management (if present).

Timing of the Fieldwork

- 2.12 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. As such all of the fieldwork was undertaken during the non-travelling season, and also avoided days of known local or national events. Fieldwork was completed between January and September 2016. Whilst this did cover the summer period, the majority of interviews were not completed during July and August.

Engagement with Bricks and Mortar Households

- 2.13 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan examinations and planning appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards, intelligence from the Council, information from housing registers and other local knowledge from stakeholders, and adverts on social media (including the Friends Families and Travellers Facebook group). Through this approach we endeavoured to do everything within our means to give households living in bricks and mortar the opportunity to make their views known to us.

- 2.14 As a rule we do not extrapolate the findings from our fieldwork with bricks and mortar households up to the total estimated bricks and mortar population as a whole as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. We work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity we will put in place. Thus we are seeking to shift the burden of responsibility on to those living in bricks and mortar through demonstrating rigorous efforts to make them aware of the study.

Calculating Current and Future Need

- 2.15 To identify need, PPTS requires an assessment for current and future pitch requirements, but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

- 2.16 The first stage of the assessment sought to determine the number of occupied, vacant and potentially available supply in the study area:
- » Current vacant pitches.
 - » Pitches currently with planning consent due to be developed within 5 years.
 - » Pitches vacated by people moving to housing.
 - » Pitches vacated by people moving from the study area (out-migration).
- 2.17 It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation – i.e. on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically vacant pitches on small private family sites are not included as components of available supply, but can be used to meet any current and future need arising from families living on this site.

Current Need

- 2.18 The second stage is to identify components of current need. It is important to address issues of double counting – for example concealed or doubled-up households may also be on a waiting list, as may households in bricks and mortar. Current need is made up of the following:
- » Households on unauthorised developments for which planning permission is not expected.
 - » Households on unauthorised encampments for which planning permission is not expected.
 - » Concealed, doubled-up or over-crowded households (including single adults).
 - » Households in bricks and mortar wishing to move to sites.
 - » Households in need on waiting lists for public sites.

Future Need

- 2.19 The final stage is to identify components of future need. This includes the following four components:
- » Older teenage children in need of a pitch of their own.
 - » Households living on sites with temporary planning permissions.
 - » New household formation.
 - » In-migration.
- 2.20 Household formation rates are often the subject of challenge at appeals or examinations. We firmly believe that any household formation rates should use a robust local evidence base where household interviews have been completed, rather than simply relying on precedent.
- 2.21 All of these components of supply and need are presented in easy to understand tables which identify the overall net need for current and future accommodation for both Gypsies and Travellers, and for Travelling Showpeople (where present). This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers are identified separately and the needs are identified to 2033.

Pitch Turnover

- 2.22 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This is an approach that usually ends up with a significant under-estimate of need as in the majority of cases vacant pitches on sites are not available to meet any additional need. The use of pitch turnover has been the subject of a number of Inspectors' Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

- 2.23 In addition a GTAA Best Practice Guide was produced in June 2016 by a number of organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply relies upon making assumptions; a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

^{2.24} As such, other than current vacant pitches on sites that are known to be available, or pitches identified during the fieldwork as becoming available, pitch turnover has not been considered as a component of supply in this GTAA. However the Council should continue to monitor need against pitch turnover through its usual annual monitoring processes.

Transit Provision

^{2.25} PPTS also requires an assessment of the need for any transit sites or stopping places. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population, a range of sites or management approaches can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » Transit sites
- » Temporary/Emergency stopping places
- » Temporary (seasonal) sites
- » Negotiated Stopping Agreements

^{2.26} In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis on an Essex-wide basis of any local records of unauthorised sites and encampments (including Direction to Leave Notices), as well as information from the CLG Traveller Caravan Count. The outcomes of the interviews with Council Officers, Officers from neighbouring local authorities and other stakeholders that were undertaken during the previous GTAA were also taken into consideration when determining this element of need in the study area.

3. PPTS (2015) Planning Definition

- 3.1 The primary change introduced by PPTS (2015) in relation to the assessment of need was the change in the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS has collected information necessary to assess each household against the planning definition. As PPTS (2015) has only recently been issued only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied – these support the view that households need to be able to demonstrate that they travel for work purposes (or have ceased to travel temporarily due to education, ill health or old age), and stay away from their usual place of residence when doing so.

Applying the Planning Definition

- 3.2 The household interview included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:
- » Whether any household members have travelled in the past 12 months.
 - » Whether household members have ever travelled.
 - » The main reasons for travelling (to determine whether they travel for work purposes).
 - » Where household members travel to.
 - » The times of the year that household members travel.
 - » Where household members stay when they are away travelling.
 - » When household members stopped travelling.
 - » The reasons why household members stopped travelling (to determine whether they have ceased to travel for education, ill health or old age).
 - » Whether household members intend to travel again in the future (to determine whether they have ceased travelling temporarily or permanently).
 - » When and the reasons why household members plan to travel again in the future (to determine whether they plan to travel for work purposes in the future).
- 3.3 The outcomes from these questions on travelling were used to assess the status of each household against the planning definition in PPTS (2015). Through a combination of responses households need to provide sufficient information to demonstrate that household members travel for work purposes and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future. The same definition applies to Travelling Showpeople as to Gypsies and Travellers.

- 3.4 Households that need to be formally considered in the GTAA fall under one of 3 classifications. Only those households that meet, or may meet, the planning definition will form the formal components of need to be included in the GTAA:
- » Households that travel under the planning definition.
 - » Households that have ceased to travel temporarily under the planning definition.
 - » Households where an interview was not possible who *may* fall under the planning definition.
- 3.5 Whilst the needs of those households that do not meet the planning definition do not now need to be formally included in the GTAA, they will be assessed to provide the Council with components of need to support their wider housing needs assessments.

Unknown Households

- 3.6 As well as calculating need for households that meet the planning definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) need to be considered as part of the GTAA where they are believed to be Gypsies, Travellers or Showpeople who **may** meet the planning definition. Whilst there is no law or guidance that sets out how the needs of these households should be addressed, an approach has been taken that seeks an estimate of potential need from these households. This will be a maximum additional need figure over and above the need identified for households that do meet the planning definition.
- 3.7 The estimate seeks to identify potential current and future need from many pitches known to be temporary or unauthorised, and through new household formation. For the latter the national rate of 1.50% has been used as the demographics of residents are unknown. This approach is consistent with the outcomes of a recent Planning Appeal where access to a site was not possible but basic information was known about the number of households residing there. (Planning Inspectorate Ref: APP/Z6950/A/14/2212012).
- 3.8 Should further information be made available to the Council that will allow for the planning definition to be applied, these households could either form a confirmed component of need to be addressed through the GTAA or the SHMA/HEDNA.
- 3.9 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.
- 3.10 However, data that has been collected from over 2,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 10% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 300 interviews that have been completed) – and in some local authorities, particularly London Boroughs, no households meet the planning definition.
- 3.11 ORS are not implying that this is an official national statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are between

12,000-14,000 Gypsy and Traveller pitches in England and we have spoken to over 12% of them at a representative range of sites and just over 10% meet the planning definition. ORS also asked similar questions on travelling in over 2,000 pre-PPTS (2015) household interviews and also found that 10% of households would have met the PPTS (2015) planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.

3.12 The Council will need to carefully consider how to address the needs associated with unknown Travellers in Local Plan policies as it is unlikely that all of these will have a need that should be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan policies the Council could consider the use of a criteria-based policy (as suggested in PPTS (2015) Paragraph 11) for any unknown households that do provide evidence that they meet the planning definition, and also take into account the NPPF.

3.13 How the ORS methodology addresses need from unknown households was supported by the Planning Inspector for a recent Local Plan Examination in Maldon, Essex. In his Report that was published on 29th June 2017 he concluded:

150. The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist. That being said, MM242h is nonetheless necessary in this regard. It commits the Council to a review of the Plan if future reviews of the GTAA reveal the necessity for land allocations to provide for presently 'unknown' needs. For effectiveness, I have altered this modification from the version put forward by the Council by replacing the word "may" with "will" in relation to undertaking the review committed to. I have also replaced "the Plan" with "Policy H6" – the whole Plan need not be reviewed.

Households that do not meet the Planning Definition

3.14 Households who do not travel or have ceased to travel permanently now fall outside the planning definition of a Traveller. However Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation under the Equality Act (2010). In addition provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance¹ related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area, for example through the SHMA or HEDNA process, and will form a subset of the wider need arising from households residing in caravans.

¹ "Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats." (March 2016)

4. Survey of Travellers

Interviews with Gypsies, Travellers and Travelling Showpeople

- 4.1 One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living in Brentwood.
- 4.2 Through the desk-based research ORS identified no public sites; 14 private sites (30 pitches); 1 temporary site (2 [pitches]); 2 tolerated sites (7 pitches); 3 unauthorised sites (16 pitches); or transit sites; and no Travelling Showpeople yards.
- 4.3 Interviews were completed between January and September 2016, with some follow-up interviews also completed in May 2017. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The table below sets out the sites/yards that were identified and visited, the number of pitches/plots, the number of interviews that were completed, and the reasons why interviews were not completed.
- 4.4 A total of 43 interviews were completed. When the pitch baseline is adjusted to take account of vacant pitches and refusals to be interviewed this represents an overall response rate of 84%.

Figure 1 – Gypsy, Traveller and Travelling Showpeople sites and yards visited in Brentwood

Site/Yard Status	Pitches/Plots	Interviews	Reasons for not completing interviews
Private Sites			
Clementines Farm	1	0	1 x no contact possible
Cottage Garden, Pilgrims Hatch	1	1	-
Deep Dell Park (Willow Farm), Ingatestone	6	5	1 x no contact possible
Lilliputs, Blackmore	2	3	-
Meadow View, Blackmore	2	2	-
Pond End, Kelvedon Hatch	1	0	1 x vacant
Ponderosa, Kelvedon Hatch	1	0	1 x no contact possible
Poplar Farm, Ingatestone	2	0	2 x no contact possible
Roman Triangle, Mountnessing	5	5	-
Rye Etch, Navestock	3	3	-
The Willows', Kelvedon Hatch	1	0	1 x no contact possible
Tree Tops, Navestock	3	1	2 x no contact possible
Warren Lane, Doddinghurst	1	0	1 x no contact possible
Wenlock Meadow	1	1	-
Temporary Sites			
The Willows', Kelvedon Hatch	2	2	-
Tolerated Sites			

Hope Farm, Navestock	3	0	2 x refusals, 1 x no contact possible
Orchard View, Navestock	4	3	1 x no contact possible
Unauthorised Sites			
Greenacres, Blackmore	9	8	3 x no contact possible
Hunters Green, Navestock	1	1	-
Lizvale Farm, Navestock	6	6	-
TOTAL	55	41	

Efforts to contact bricks and mortar

- 4.2 ORS applied a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan examinations and planning appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards, intelligence from the Council and local housing providers, and adverts on social media (including the Friends Families and Travellers Facebook group).
- 4.3 At the time of concluding this report no contacts had been identified to interview.

5. Current and Future Pitch Provision

- 5.1 This section focuses on the additional pitch provision which is needed in Brentwood currently and to 2033. This includes both current unmet need and need which is likely to arise in the future. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies completed by ORS, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- 5.2 We would note that this section is based upon a combination of the on-site surveys, planning records and discussions with Officers from the Council. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.

PPTS (2015) Planning Definition

- 5.4 As well as assessing housing need PPTS (2015) requires a GTAA to determine whether households living on sites, yards, encampments and in bricks and mortar fall within the planning definition of a Gypsy, Traveller or Travelling Showperson. Only households that fall within the planning definition, and those who *may* meet the planning definition (households where an interview was not completed), will have their housing needs assessed separately from the wider population in the GTAA. The planning definition now excludes those who have ceased to travel permanently.

New Household Formation Rates

- 5.5 Nationally, a household formation and growth rate of 3.00% net per annum has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates (2015)*. The main conclusions are set out here and the full paper is in **Appendix B**.
- 5.6 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in the Traveller Caravan Count. However this data is very unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.
- 5.7 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find

evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.

- 5.8 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers. This view has been supported by Planning Inspectors in a number of Decision Notices. The most recent was in relation to an appeal in Doncaster (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used. The Inspector concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.5% but that a 2.5% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.5% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.5% figure is justified in the case of Doncaster.

- 5.9 In addition the Technical Note has recently been accepted as a robust academic evidence base and has been published by the Social Research Association in its journal Social Research Practice. The overall purpose of the journal is to encourage and promote high standards of social research for public benefit. It aims to encourage methodological development by giving practitioners the space and the incentive to share their knowledge – see link below.

<http://the-sra.org.uk/journal-social-research-practice/>

- 5.10 ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the baseline includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates.
- 5.11 Overall, the household growth rate used for the assessment of future needs has been informed by local evidence. This demographic evidence from the household interviews has been used to adjust the national growth rate of 1.50% up or down based on the proportion of those aged under 18 in each local authority (by planning status).
- 5.12 In certain circumstances where the numbers of households and children are low it is not appropriate to apply a percentage rate for new household formation. In these cases a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.

- 5.13 Research by ORS has also identified a national growth rate of 1.00% for Travelling Showpeople and this has also been adjusted locally based on site demographics.
- 5.14 The outcomes in Brentwood are that new household formation for Gypsies and Travellers who meet the planning definition has used a rate of 1.40% (national rate adjusted downwards as a lower proportion are aged under 18); a rate of 1.85% for Gypsy and Traveller households that do not meet the planning definition (national rate adjusted upwards as a higher proportion are aged under 18); and the national rate of 1.50% has been used for unknown households.

Breakdown by 5 Year Bands

- 5.15 In addition to tables which set out the overall need for Gypsies, Travellers and Travelling Showpeople, the need has also been broken down by 5 year bands as required by PPTS (2015). The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from older teenage children, and net movement from bricks and mortar) in the first 5 years. Total net new household formation is split across the 5 year bands based on the compound rate of growth that was applied – as opposed to being spread evenly.

Applying the Planning Definition

- 5.16 The outcomes from the questions in the household survey on travelling were used to assess each household against the planning definition in PPTS (2015). This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether and why they plan to travel again in the future. This assessment was based on the verbal responses to the questions given to interviewers as it is understood that oral evidence is capable of being sufficient when determining whether households meet the planning definition.
- 5.3 Figure 2 shows that for Gypsies and Travellers 9 household meet the planning definition in that it was able to be determined that they travel for work purposes and stay away from their usual place of residence, or have ceased to travel temporarily. A total of 32 Gypsy and Traveller households did not meet the planning definition as they were not able to provide information that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons to visit fairs, relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.
- 5.4 The number of households on each site where an interview was not possible are recorded as unknown. The reasons for this included households that refused to be interviewed and households that were not present during the fieldwork period – despite up to 3 visits.

Figure 2 – Planning status of households in Brentwood

Site Status	Meet Planning Definition	Unknown	Do Not Meet Planning Definition	TOTAL
Private Sites	7	9	14	30
Temporary Sites	0	0	2	2
Tolerated Sites	0	4	3	7
Unauthorised Sites	2	3	13	18
TOTAL	9	16	32	57

Pitch Needs – Gypsies and Travellers that meet the Planning Definition

- 5.5 The households who meet the planning definition were found on 5 private sites and 2 unauthorised sites. Analysis of the household interview identify that there is need for 2 additional pitches that are currently unauthorised, 3 additional pitches for concealed or doubled-up households or single adults, 2 additional pitches for teenage children in need of a pitch of their own in the next 5 years, and 4 additional pitches through new household formation using a rate of 1.40% based on the demographics of those who were interviewed. There is no supply from vacant pitches.
- 5.6 Therefore the overall level of additional need for those households who meet the planning definition of a Gypsy or Traveller is for **11 additional pitches** over the GTAA period to 2033.

Figure 3 – Additional need for Gypsy and Traveller households in Brentwood that meet the Planning Definition (2017-2033)

Gypsies and Travellers - Meeting Planning Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches to be vacated by households moving to bricks and mortar	0
Pitches to be vacated by households moving to another area	0
Total Supply	0
Current Need	
Households on unauthorised developments	2
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	3
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	5
Future Need	
5 year need from older teenage children	2
Households on sites with temporary planning permission	0
In-migration	0
New household formation	4
<i>(Household base 14 and formation rate 1.40%)</i>	
Total Future Needs	6
Net Pitch Total = (Current and Future Need – Total Supply)	11

Figure 4 – Additional need for Gypsy and Traveller households in Brentwood that meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16-17	Total
	2016-21	2021-26	2026-31	2031-33	
	8	1	1	1	11

Pitch Needs – Unknown Gypsies and Travellers

- 5.7 Whilst it was not possible to determine the planning status of a total of 16 households as they were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and **may** meet the planning definition.
- 5.8 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.
- 5.9 However data that has been collected from over 2,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 10% of households that have been interviewed meet the planning definition.
- 5.10 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through other means.
- 5.11 Should further information be made available to the Council that will allow for the planning definition to be applied to the unknown households, the overall level of need could rise by up to 5 pitches from new household formation (this uses a base of the 16 households and a net growth rate of 1.50%²), and by 3 pitches that are currently unauthorised. Therefore additional need *could* increase by up to a further 8 pitches, plus any concealed adult households or 5 year need arising from older teenagers living in these households (if all 16 unknown pitches are deemed to meet the planning definition). However, as an illustration, if the ORS national average of 10% were to be applied this could be as few as 1 additional pitch. Tables setting out the components of need for unknown households can be found in **Appendix A**.

Gypsies and Travellers that do not meet the Planning Definition

- 5.12 It is not now a requirement for a GTAA to include an assessment of need for households that do not meet the planning definition. However this assessment is included for illustrative purposes and to provide the Council with information on levels of need that will have to be addressed through the SHMA or HEDNA and through separate Local Plan policies. On this basis, it is evident that whilst the needs of the 32 households who do not meet the planning definition will represent only a very small proportion

² The ORS *Technical Note on Population and Household Growth (2015)* has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as some identified as Romany Gypsies.

- 5.13 The 32 households live on 6 private sites, 1 temporary site, 1 tolerated site and 2 unauthorised sites. Analysis of the site interviews has identified a need of 13 from unauthorised pitches, 2 from pitches with temporary planning permission, 11 from concealed or doubled-up households or single adults, 13 from older teenage children in need of a pitch of their own in the next 5 years and 20 from new household formation using a rate of 1.85% based on the demographics from the households that were interviewed. Therefore the total additional need is for 59 pitches over the GTAA period to 2033.
- 5.14 A summary of this need can be found in **Appendix A**.

Plot Needs – Travelling Showpeople

- 5.15 There were no Travelling Showpeople identified in Brentwood so there are no current or future accommodation needs.

Transit Requirements

- 5.16 When determining the potential need for transit provision the assessment has looked at data from the DCLG Traveller Caravan Count, the outcomes of the stakeholder interviews and local records on numbers of unauthorised encampments, and the potential wider issues related to changes made to PPTS in 2015.

DCLG Caravan Count

- 5.17 Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Caravan Count is a count of caravans and not households or pitches/plots. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) ‘snapshot in time’ conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- 5.18 Data from the Caravan Count shows that there have been low numbers of non-tolerated unauthorised caravans on land not owned by Travellers recorded in Brentwood in recent years – recorded only during the summer months.

Stakeholder Interviews and Local Data

- 5.19 Information from the stakeholder interviews that were completed for the previous GTAA that was published in 2014 also confirmed that there are low levels of unauthorised encampments and that the majority were during the summer months, short-term visiting family or friends, transient and simply

passing through. Stakeholders reported short-term summertime encampments on the coast at Holland Marshes, or on the Seafront Gardens. The vans stay for a few days and then move on. . In addition information collated by ECTU has recorded a total of 45 unauthorised encampments in Brentwood since 2013.

Potential Implications of PPTS (2015)

- 5.20 It has been suggested by a number of organisations and individuals representing the Travelling Community that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling seeking to meet the planning definition. This may well be the case but it will take some time for any changes to become apparent. As such the use of historic evidence to make an assessment of future transit need is not recommended at this time. Any recommendation for future transit provision will need to make use of a robust post-PPTS (2015) evidence base and there has not been sufficient time yet for this to be developed.

Transit Recommendations

- 5.21 Whilst there is historic evidence to suggest the need for some form of transit provision in Brentwood (and Essex), it is not recommended that any should be provided at this point in time as the robustness of the data which could indicate this is not considered to be sufficient. It is recommended that the situation relating to levels of unauthorised encampments should continue to be monitored whilst any potential changes associated with PPTS (2015) develop, and also to allow detailed analysis of Decision to Leave Notices on an Essex-wide basis. Brentwood Council is therefore recommended to engage, through the Duty to Cooperate, with the other Essex authorities in the future to ensure this work on transit sites can be completed.
- 5.22 As well as information on the size and duration of the encampments, the monitoring should also seek to gather information from residents on the reasons for their stay in Brentwood; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in Brentwood; and whether their travelling is a result of changes to PPTS (2015). This information could be collected as part of a Welfare Assessment (or equivalent).
- 5.23 A review of the evidence base relating to unauthorised encampments, including the monitoring referred to above and analysis of Decision to Leave Notices should be undertaken over the next 12 months. This will establish whether there is a need for investment in any formal transit sites or emergency stopping places, where this provision needs to be located, or whether a managed approach is preferable.
- 5.24 In the short-term the Council should consider the use of existing management arrangements for dealing with unauthorised encampments and could also consider the use of Negotiated Stopping Agreements, as opposed to taking forward an infrastructure-based approach.
- 5.25 The term ‘negotiated stopping’ is used to describe agreed short term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.

5.26 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold water supply; portaloos; sewerage disposal point and refuse disposal facilities.

6. Conclusions

- 6.1 This study provides an robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, and the Housing and Planning Act 2016. It also provides the evidence base which can be used to support Local Plan policies.

Gypsies and Travellers

- 6.2 In summary there is a need for **11 additional pitches** in Brentwood over the GTAA period to 2033 for Gypsy and Traveller households that meet the planning definition; a need for up to 8 additional pitches for Gypsy and Traveller households that may meet the planning definition – although if the ORS national average of 10% were to be applied this could be as few as no additional pitches; and a need for 59 additional pitches for Gypsy and Traveller households who do not meet the planning definition – if the potential need from 90% of unknown households is added to this the total need for non-Travelling households could rise to 66 additional pitches. A breakdown of where this need should be addressed is set out in the table below.

Figure 5 – Additional need for Gypsy and Traveller households broken down by potential delivery method

Site Status	Gypsy and Traveller Local Plan Policy	SHMA Housing Policy	TOTAL
Meet Planning Definition (+ 10% Unknown)	12	0	12
Not meeting Planning Definition (+ 90% Unknown)	0	66	66
TOTAL	12	66	78

Travelling Showpeople

- 6.3 There were no Travelling Showpeople identified in Brentwood so there is no current or future need for additional plots.

Transit Provision

- 6.4 Whilst there is historic evidence to suggest the need for some form of transit provision in Brentwood (and Essex), it is not recommended that any should be provided at this point in time as the robustness of the data which could indicate this is not considered to be sufficient. It is recommended that the situation relating to levels of unauthorised encampments should continue to be monitored whilst any potential changes associated with PPTS (2015) develop, and also to allow detailed analysis of 'Decision to Leave Notices' on an Essex-wide basis. Brentwood Council is therefore recommended to engage,

through the Duty to Cooperate, with the other Essex authorities in the future to ensure this work on Transit Sites can be completed. This will establish whether there is a need for investment in more formal transit sites or emergency stopping places.

- 6.5 In the short-term the Council should consider the use of short-term toleration or negotiated stopping agreements to deal with any encampments, as opposed to taking forward an infrastructure-based approach.

Appendix A – Need from unknown and households that do not meet the Planning Definition

Additional need for unknown Gypsy and Traveller households in Brentwood (2016-33)

Gypsies and Travellers - Unknown	Pitches
Supply of Plots	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	3
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	3
Future Need	
5 year need from older teenage children	0
Households on sites with temporary planning permission	0
In-migration	0
New household formation	5
<i>(Household base 16 and formation rate of 1.50%)</i>	
Total Future Needs	5
Net Pitch Total = (Current and Future Need – Total Supply)	8

Additional need for unknown Gypsy and Traveller households in Brentwood by 5 year periods

Years	0-5	6-10	11-15	16-17	Total
	2016-21	2021-26	2026-31	2031-33	
	4	1	2	1	8

Additional need Gypsy and Traveller households in Brentwood that do not meet the Planning Definition (2016-33)

Gypsies and Travellers – Not Meeting New Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	13
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	11
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	24
Future Need	
5 year need from older teenage children	13
Households on sites with temporary planning permission	2
In-migration	0
New household formation	20
<i>(Household base 56 and formation rate 1.85%)</i>	
Total Future Needs	35
Net Pitch Total = (Current and Future Need – Total Supply)	59

Additional need for Gypsy and Traveller households in Brentwood that do not meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16-17	Total
	2016-21	2021-26	2026-31	2031-33	
	44	6	6	3	59

Appendix B – ORS Technical Note on Household Formation and Growth Rates



Technical Note

Gypsy and Traveller Household Formation and Growth Rates

August 26th 2015

Opinion Research Services
Spin-out company of Swansea University



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Household Growth Rates

Abstract and conclusions

1. National and local household formation and growth rates are important components of Gypsy and Traveller accommodation assessments, but little detailed work has been done to assess their likely scale. Nonetheless, nationally, a net growth rate of 3% per annum has been commonly assumed and widely used in local assessments – even though there is actually no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically.
2. Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data are unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis (which, of course, is used to assess housing needs in the settled community).
3. The growth in the Gypsy and Traveller population may be as low as 1.25% per annum – a rate which is much less than the 3% per annum often assumed, but still at least four times greater than in the general population. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2% per annum nationally.
4. The often assumed 3% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.5% per annum for Gypsies and Travellers.
5. Some local authorities might perhaps allow for a household growth rate of up to 2.5% per annum, to provide a ‘margin’ if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller communities, the lower estimate of 1.5% per annum should be used for planning purposes.

Introduction

6. The rate of household growth is a key element in all housing assessments, including Gypsy and Traveller accommodation assessments. Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher *gross* household formation rates. However, while their *gross* rate of household growth might be high, Gypsy and Traveller communities’ future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing. Therefore, the *net* rate of household growth is the *gross* rate of formation *minus* any reductions in households due to such factors. Of course, it is the *net* rate that is important in determining future accommodation needs for Gypsies and Travellers.

7. In this context, it is a matter of concern that many Gypsy and Traveller accommodation needs assessments have not distinguished *gross* and *net* growth rates nor provided evidence for their assumed rates of household increase. These deficiencies are particularly important because when assumed growth rates are unrealistically high, and then compounded over a number of planning years, they can yield exaggerated projections of accommodation needs and misdirect public policy. Nonetheless, assessments and guidance documents have assumed 'standard' *net* growth rates of about 3% without sufficiently recognising either the range of factors impacting on the *gross* household growth rates or the implications of unrealistic assumptions when projected forward on a compound basis year by year.
8. For example, in a study for the Office of the Deputy Prime Minister ('Local Authority Gypsy and Traveller Sites in England', 2003), Pat Niner concluded that *net* growth rates as high as 2%-3% per annum should be assumed. Similarly, the Regional Spatial Strategies (RSS) (which continued to be quoted after their abolition was announced in 2010) used *net* growth rates of 3% per annum without providing any evidence to justify the figure (For example, 'Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England July 2009').
9. However, the guidance of the Department of Communities and Local Government ('Gypsy and Traveller Accommodation Needs Assessments: Guidance', 2007) was much clearer in saying that:

The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count. [In footnote 6, page 25]

10. The guidance emphasises that local information and trends should always be taken into account – because the *gross* rate of household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a *gross* growth rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting *net* household growth rate that matters for planning purposes in assessing future accommodation needs.
11. The current guidance also recognises that assessments should use local evidence for *net* future household growth rates. A letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) said:

I can confirm that the annual growth rate figure of 3% does not represent national planning policy.

The previous Administration's guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority's own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure.'

12. Therefore, while there are many assessments where a national Gypsy and Traveller household growth rate of 3% per annum has been assumed (on the basis of 'standard' precedent and/or guidance), there is little to justify this position and it conflicts with current planning guidance. In this context, this document seeks to integrate available evidence about *net* household growth rates in order to provide a more robust basis for future assessments.

Compound growth

13. The assumed rate of household growth is crucially important for Gypsy and Traveller studies because for future planning purposes it is projected over time on a compound basis – so errors are progressively enlarged. For example, if an assumed 3% *net* growth rate is compounded each year then the implication is that the number of households will double in only 23.5 years; whereas if a *net* compound rate of 1.5% is used then the doubling of household numbers would take 46.5 years. The table below shows the impact of a range of compound growth rates.

Table 1
Compound Growth Rates and Time Taken for Number of Households to Double

Household Growth Rate per Annum	Time Taken for Household to Double
3.00%	23.5 years
2.75%	25.5 years
2.50%	28 years
2.25%	31 years
2.00%	35 years
1.75%	40 years
1.50%	46.5 years

14. The above analysis is vivid enough, but another illustration of how different rates of household growth impact on total numbers over time is shown in the table below – which uses a baseline of 100 households while applying different compound growth rates over time. After 5 years, the difference between a 1.5% growth rate and a 3% growth rate is only 8 households (116 minus 108); but with a 20-year projection the difference is 46 households (181 minus 135).

Table 2
Growth in Households Over time from a Baseline of 100 Households

Household Growth Rate per Annum	5 years	10 years	15 years	20 years	50 years	100 years
3.00%	116	134	156	181	438	1,922
2.75%	115	131	150	172	388	1,507
2.50%	113	128	145	164	344	1,181
2.25%	112	125	140	156	304	925
2.00%	110	122	135	149	269	724
1.75%	109	119	130	141	238	567
1.50%	108	116	125	135	211	443

15. In summary, the assumed rate of household growth is crucially important because any exaggerations are magnified when the rate is projected over time on a compound basis. As we have shown, when compounded and projected over the years, a 3% annual rate of household growth implies much larger future Gypsy and Traveller accommodation requirements than a 1.5% per annum rate.

Caravan counts

16. Those seeking to demonstrate national Gypsy and Traveller household growth rates of 3% or more per annum have, in some cases, relied on increases in the number of caravans (as reflected in caravan counts) as their evidence. For example, some planning agents have suggested using 5-year trends in the national caravan count as an indication of the general rate of Gypsy and Traveller household growth. For example, the count from July 2008 to July 2013 shows a growth of 19% in the number of caravans on-site – which is equivalent to an average annual compound growth rate of 3.5%. So, *if plausible*, this approach could justify using a 3% or higher annual household growth rate in projections of future needs.
17. However, caravan count data are unreliable and erratic. For example, the July 2013 caravan count was distorted by the inclusion of 1,000 caravans (5% of the total in England) recorded at a Christian event near Weston-Super-Mare in North Somerset. Not only was this only an estimated number, but there were no checks carried out to establish how many caravans were occupied by Gypsies and Travellers. Therefore, the resulting count overstates the Gypsy and Traveller population and also the rate of household growth.
18. ORS has applied the caravan-counting methodology hypothetically to calculate the implied national household growth rates for Gypsies and Travellers over the last 15 years, and the outcomes are shown in the table below. The January 2013 count suggests an average annual growth rate of 1.6% over five years, while the July 2013 count gives an average 5-year rate of 3.5%; likewise a study benchmarked at January 2004 would yield a growth rate of 1%, while one benchmarked at January 2008 would imply a 5% rate of growth. Clearly any model as erratic as this is not appropriate for future planning.

Table 3
National CLG Caravan Count July 1998 to July 2014 with Growth Rates (Source: CLG)

Date	Number of caravans	5 year growth in caravans	Percentage growth over 5 years	Annual over last 5 years.
Jan 2015	20,123	1,735	9.54%	1.84%
July 2014	20,035	2,598	14.90%	2.81%
Jan 2014	19,503	1,638	9.17%	1.77%
July 2013	20,911	3,339	19.00%	3.54%
Jan 2013	19,359	1,515	8.49%	1.64%
Jul 2012	19,261	2,112	12.32%	2.35%
Jan 2012	18,746	2,135	12.85%	2.45%
Jul 2011	18,571	2,258	13.84%	2.63%
Jan 2011	18,383	2,637	16.75%	3.15%
Jul 2010	18,134	2,271	14.32%	2.71%
Jan 2010	18,370	3,001	19.53%	3.63%
Jul 2009	17,437	2,318	15.33%	2.89%
Jan 2009	17,865	3,503	24.39%	4.46%
Jul 2008	17,572	2,872	19.54%	3.63%
Jan 2008	17,844	3,895	27.92%	5.05%

Jul 2007	17,149	2,948	20.76%	3.84%
Jan 2007	16,611	2,893	21.09%	3.90%
Jul 2006	16,313	2,511	18.19%	3.40%
Jan 2006	15,746	2,352	17.56%	3.29%
Jul 2005	15,863	2,098	15.24%	2.88%
Jan 2005	15,369	1,970	14.70%	2.78%
Jul 2004	15,119	2,110	16.22%	3.05%
Jan 2004	14,362	817	6.03%	1.18%
Jul 2003	14,700			
Jan 2003	13,949			
Jul 2002	14,201			
Jan 2002	13,718			
Jul 2001	13,802			
Jan 2001	13,394			
Jul 2000	13,765			
Jan 2000	13,399			
Jan 1999	13,009			
Jul 1998	13,545			

19. The annual rate of growth in the number of caravans varies from slightly over 1% to just over 5% per annum. We would note that if longer time periods are used the figures do become more stable. Over the 36 year period 1979 (the start of the caravan counts) to 2015 the compound growth rate in caravan numbers has been 2.5% per annum.
20. However, there is no reason to assume that these widely varying rates correspond with similar rates of increase in the household population. In fact, the highest rates of caravan growth occurred between 2006 and 2009, when the first wave of Gypsy and Traveller accommodation needs assessments were being undertaken – so it seems plausible that the assessments prompted the inclusion of additional sites and caravans (which may have been there, but not counted previously). Counting caravan numbers is very poor proxy for Gypsy and Traveller household growth. Caravans counted are not always occupied by Gypsy and Traveller families and numbers of caravans held by families may increase generally as affluence and economic conditions improve, (but without a growth in households)
21. There is no reason to believe that the varying rates of increase in the number of caravans are matched by similar growth rates in the household population. The caravan count is not an appropriate planning guide and the only proper way to project future population and household growth is through demographic analysis – which should consider both population and household growth rates. This approach is not appropriate to needs studies for the following reasons:

Modelling population growth

Introduction

22. The basic equation for calculating the rate of Gypsy and Traveller population growth seems simple: start with the base population and then calculate the average increase/decrease by allowing for births, deaths and in-/out-migration. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context, ORS has modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates, and by using PopGroup (the leading software for

population and household forecasting). To do so, we have supplemented the available national statistical sources with data derived locally (from our own surveys) and in some cases from international research. None of the supplementary data are beyond question, and none will stand alone; but, when taken together they have cumulative force. In any case the approach we adopt is more critically self-aware than simply adopting 'standard' rates on the basis of precedent.

Migration effects

23. Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents. In relation to local migration effects, Gypsies and Travellers can and do move between local authorities – but in each case the in-migration to one area is matched by an out-migration from another area. Since it is difficult to estimate the net effect of such movements over local plan periods, ORS normally assumes that there will be nil net migration to/from an area. Nonetheless, where it is possible to estimate specific in-/out- migration effects, we take account of them, while distinguishing between migration and household formation effects.

Population profile

24. The main source for the rate of Gypsy and Traveller population growth is the UK 2011 Census. In some cases the data can be supplemented by ORS's own household survey data which is derived from more than 2,000 face-to-face interviews with Gypsies and Travellers since 2012. The ethnicity question in the 2011 census included for the first time 'Gypsy and Irish Traveller' as a specific category. While non-response bias probably means that the size of the population was underestimated, the age profile the census provides is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.
25. The age profile is important, as the table below (derived from census data) shows. Even assuming zero deaths in the population, achieving an annual population growth of 3% (that is, doubling in size every 23.5 years) would require half of the "year one" population to be aged under 23.5 years. When deaths are accounted for (at a rate of 0.5% per annum), to achieve the same rate of growth, a population of Gypsies and Travellers would need about half its members to be aged under 16 years. In fact, though, the 2011 census shows that the midway age point for the national Gypsy and Traveller population is 26 years – so the population could not possibly double in 23.5 years.

Table 4

Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)

Age Group	Number of People	Cumulative Percentage
Age 0 to 4	5,725	10.4
Age 5 to 7	3,219	16.3
Age 8 to 9	2,006	19.9
Age 10 to 14	5,431	29.8
Age 15	1,089	31.8
Age 16 to 17	2,145	35.7
Age 18 to 19	1,750	38.9

Age 20 to 24	4,464	47.1
Age 25 to 29	4,189	54.7
Age 30 to 34	3,833	61.7
Age 35 to 39	3,779	68.5
Age 40 to 44	3,828	75.5
Age 45 to 49	3,547	82.0
Age 50 to 54	2,811	87.1
Age 55 to 59	2,074	90.9
Age 60 to 64	1,758	94.1
Age 65 to 69	1,215	96.3
Age 70 to 74	905	97.9
Age 75 to 79	594	99.0
Age 80 to 84	303	99.6
Age 85 and over	230	100.0

Birth and fertility rates

26. The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 10.4% of the Gypsy and Traveller population – which means that, on average, 2.1% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 29.8% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year. (Deaths during infancy will have minimal impact within the early age groups, so the data provides the best basis for estimating of the birth rate for the Gypsy and Traveller population.)
27. The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood. We know of only one estimate of the fertility rates of the UK Gypsy and Traveller community. This is contained in the book, ‘Ethnic identity and inequalities in Britain: The dynamics of diversity’ by Dr Stephen Jivraj and Professor Ludi Simpson published in May 2015. This draws on the 2011 Census data and provides an estimated total fertility rate of 2.75 for the Gypsy and traveller community
28. ORS’s have been able to examine our own survey data to investigate the fertility rate of Gypsy and Traveller women. The ORS data shows that, on average, Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFRs were not completed). On this basis it is reasonable to assume an average of three children per woman during her lifetime which would be consistent with the evidence from the 2011 Census of a figure of around 2.75 children per woman. In any case, the TFR for women aged 24 years is 1.5 children, which is significantly short of the number needed to double the population in 23.5 years – and therefore certainly implies a net growth rate of less than 3% per annum.

Death rates

29. Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account – which means that the *net* population growth cannot conceivably achieve 2% per

annum. In England and Wales there are nearly half-a-million deaths each year – about 0.85% of the total population of 56.1 million in 2011. If this death rate is applied to the Gypsy and Traveller community then the resulting projected growth rate is in the region of 1.15%-1.25% per annum.

30. However, the Gypsy and Traveller population is significantly younger than average and may be expected to have a lower percentage death rate overall (even though a smaller than average proportion of the population lives beyond 68 to 70 years). While there can be no certainty, an assumed death rate of around 0.5% to 0.6% per annum would imply a net population growth rate of around 1.5% per annum.
31. Even though the population is younger and has a lower death rate than average, Gypsies and Travellers are less likely than average to live beyond 68 to 70 years. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) 'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative', University of Sheffield). Therefore, in our population growth modelling we have used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 census (and also in ORS's own survey data). On the basis of the Sheffield study, we could have supposed a life expectancy of only 68, but we have been cautious in our approach.

Modelling outputs

32. If we assume a TFR of 3 and an average life expectancy of 72 years for Gypsies and Travellers, then the modelling projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum (well below the 3% per annum often assumed). If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.5% per annum. To generate an 'upper range' rate of population growth, we have assumed a TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.9% per annum. We should note, though, that national TFR rates of 4 are currently found only in sub-Saharan Africa and Afghanistan, so it is an implausible assumption.
33. There are indications that these modelling outputs are well founded. For example, in the ONS's 2012-based Sub-National Population Projections the projected population growth rate for England to 2037 is 0.6% per annum, of which 60% is due to natural change and 40% due to migration. Therefore, the natural population growth rate for England is almost exactly 0.35% per annum – meaning that our estimate of the Gypsy and Traveller population growth rate is four times greater than that of the general population of England.
34. The ORS Gypsy and Traveller findings are also supported by data for comparable populations around the world. As noted, on the basis of sophisticated analysis, Hungary is planning for its Roma population to grow at around 2.0% per annum, but the underlying demographic growth is typically closer to 1.5% per annum. The World Bank estimates that the populations of Bolivia, Cambodia, Egypt, Malaysia, Pakistan, Paraguay, Philippines and Venezuela (countries with high birth rates and improving life expectancy) all show population growth rates of around 1.7% per annum. Therefore, in the context of national data, ORS's modelling and plausible international comparisons, it is implausible to assume a net 3% annual growth rate for the Gypsy and Traveller population.

Household growth

35. In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller (childless or single person) households (including, of course, older people (following divorce or as surviving partners)). Based on such factors, the CLG 2012-based projections convert current population data to a projected household growth rate of 0.85% per annum (compared with a population growth rate of 0.6% per annum).
36. Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.5% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households form. However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.
37. Based on the 2011 census, the table below compares the age of household representatives in English households with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general English population 3.6% of household representatives are aged 16-24, compared with 8.7% in the Gypsy and Traveller population. Because the census includes both housed and on-site Gypsies and Travellers without differentiation, it is not possible to know if there are different formation rates on sites and in housing. However, ORS's survey data (for sites in areas such as Central Bedfordshire, Cheshire, Essex, Gloucestershire and a number of authorities in Hertfordshire) shows that about 10% of Gypsy and Traveller households have household representatives aged under-25 years.

Table 5

Age of Head of Household (Source: UK Census of Population 2011)

Age of household representative	All households in England		Gypsy and Traveller households in England	
	Number of households	Percentage of households	Number of households	Percentage of households
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
Total	22,063,368	100%	19,458	100%

38. The following table shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents, fewer couples without children, and fewer households with non-dependent children amongst Gypsies and Travellers. This data suggest that Gypsy and Traveller households form at an earlier age than the general population.

Table 6
Household Type (Source: UK Census of Population 2011)

Household Type	All households in England		Gypsy and Traveller households in England	
	Number of households	Percentage of households	Number of households	Percentage of households
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no children	5,681,847	25.7%	2345	12.1%
Couple with dependent children	4,266,670	19.3%	3683	18.9%
Couple with non-dependent children	1,342,841	6.1%	822	4.2%
Lone parent: Dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
Total	22,063,368	100%	19,458	100%

39. ORS's own site survey data is broadly compatible with the data above. We have found that: around 50% of pitches have dependent children compared with 45% in the census; there is a high proportion of lone parents; and about a fifth of Gypsy and Traveller households appear to be single person households. One possible explanation for the census finding a higher proportion of single person households than the ORS surveys is that many older households are living in bricks and mortar housing (perhaps for health-related reasons).
40. ORS's on-site surveys have also found more female than male residents. It is possible that some single person households were men linked to lone parent females and unwilling to take part in the surveys. A further possible factor is that at any time about 10% of the male Gypsy and Traveller population is in prison – an inference drawn from the fact that about 5% of the male prison population identify themselves as Gypsies and Travellers ('People in Prison: Gypsies, Romany and Travellers', Her Majesty's Inspectorate of Prisons, February 2004) – which implies that around 4,000 Gypsies and Travellers are in prison. Given that almost all of the 4,000 people are male and that there are around 200,000 Gypsies and Travellers in total, this equates to about 4% of the total male population, but closer to 10% of the adult male population.
41. The key point, though, is that since 20% of Gypsy and Traveller households are lone parents, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates. While there are differences with the general population, a 1.5% per annum Gypsy and Traveller population

growth rate is likely to lead to a household growth rate of 1.5% per annum – more than the 0.85% for the English population as a whole, but much less than the often assumed 3% rate for Gypsies and Travellers.

Household dissolution rates

42. Finally, consideration of household dissolution rates also suggests that the net household growth rate for Gypsies and Travellers is very unlikely to reach 3% per annum (as often assumed). The table below, derived from ORS's mainstream strategic housing market assessments, shows that generally household dissolution rates are between 1.0% and 1.7% per annum. London is different because people tend to move out upon retirement, rather than remaining in London until death. To adopt a 1.0% dissolution rate as a standard guide nationally would be too low, because it means that average households will live for 70 years after formation. A 1.5% dissolution rate would be a more plausible as a national guide, implying that average households live for 47 years after formation.

Table 7
Annual Dissolution Rates (Source: SHMAs undertaken by ORS)

Area	Annual projected household dissolution	Number of households	Percentage
Greater London	25,000	3,266,173	0.77%
Blaenau Gwent	468.2	30,416	1.54%
Bradford	3,355	199,296	1.68%
Ceredigion	348	31,562	1.10%
Exeter, East Devon, Mid Devon, Teignbridge and Torbay	4,318	254,084	1.70%
Neath Port Talbot	1,352	57,609	2.34%
Norwich, South Norfolk and Broadland	1,626	166,464	0.98%
Suffolk Coastal	633	53,558	1.18%
Monmouthshire Newport Torfaen	1,420	137,929	1.03%

43. The 1.5% dissolution rate is important because the death rate is a key factor in moderating the *gross* household growth rate. Significantly, applying a 1.5% dissolution rate to a 3% *gross* household growth formation rate yields a *net* rate of 1.5% per annum – which ORS considers is a realistic figure for the Gypsy and Traveller population and which is in line with other demographic information. After all, based on the dissolution rate, a *net* household formation rate of 3% per annum would require a 4.5% per annum *gross* formation rate (which in turn would require extremely unrealistic assumptions about birth rates).

Summary conclusions

44. Future Gypsy and Traveller accommodation needs have typically been over-estimated because population and household growth rates have been projected on the basis of assumed 3% per annum net growth rates.
45. Unreliable caravan counts have been used to support the supposed growth rate, but there is no reason to suppose that the rate of increase in caravans corresponds to the annual growth of the Gypsy and Traveller population or households.

46. The growth of the national Gypsy and Traveller population may be as low as 1.25% per annum – which is still four times greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that the net national Gypsy and Traveller population and household growth is above 2% per annum nationally. The often assumed 3% net household growth rate per annum for Gypsies and Travellers is unrealistic.
47. The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.5% per annum. The often assumed 3% per annum net rate is unrealistic. Some local authorities might allow for a household growth rate of up to 2.5% per annum, to provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, the lower estimate of 1.5% per annum should be used.

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TO FOLLOW

Appendix D: Brentwood Economic Futures 2013-2033 – Final Draft Report, Lichfields
(November 2017)

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Green Belt Study Part I: London Metropolitan Green Belt Overview

Report Reference: CE-BW-0585-RP06 - Draft v2i

10 November 2017



Produced by Crestwood Environmental Ltd.

WORKING DRAFT

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This report has been prepared in good faith, with all reasonable skill, care and diligence, based on information provided or known available at the time of its preparation and within the scope of work agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

The report is provided for the sole use of the named client and is confidential to them and their professional advisors. No responsibility is accepted to others.

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1 INTRODUCTION

1.1 THE BRIEF

1.1.1 Brentwood Borough Council (**'the Council'**) has commissioned Crestwood Environmental Ltd. in September 2017 to provide a summary document to describe the context of the London Metropolitan Green Belt, outlining its history and potential future, specifically in relation to Brentwood Borough. The document is not intended to be an assessment of policy position, but rather to provide contextual information for reference in relation to the emerging Brentwood Local Plan. This summary document forms Part 1 of a suite of Green Belt Assessment documents.

1.2 CRESTWOOD ENVIRONMENTAL

1.2.1 Crestwood Environmental Ltd. is an independent environmental consultancy and a Registered Practice of the Landscape Institute, employing experienced landscape architects, and planning and environmental professionals with extensive experience in land-use planning and impact assessments.

1.3 SCOPE

1.3.1 Local Planning Authorities have a duty to produce development plans guiding the strategic development and landuse planning within a borough, district, county or unitary authority area. Brentwood Borough Council is the Local Planning Authority responsible for guiding development in Brentwood borough. The Council is in the process of developing a new Local Plan. The Borough is wholly located within the London Metropolitan Green Belt.

1.3.2 National policy requires that each local authority should plan to meet its Objectively Assessed Housing Need, but also requires that Local authorities comply with land use policies relating to Green Belt.

1.3.3 Given that 89% of Brentwood Borough is designated as Green Belt, it is important that the development of the emerging Local Plan is placed in the context of the Green Belt protections afforded.

1.3.4 This document sets out:

- The current context of Green Belt land in England and the London Metropolitan Green Belt;
- A brief history of the Green Belt and London Metropolitan Green Belt;
- An overview of past and current national Green Belt policy;
- An overview of current Government housing policy and relationship to Green Belt policy; and
- A brief overview of future Green Belt policy considerations.

- 2.1.4 For the most part, Brentwood Borough has been located within the Metropolitan Green Belt since the outer boundary was first defined in the County of Essex Development Plan, approved in 1957. The Green Belt was extended to cover the northern part of the Borough in the subsequent Review, approved in 1976.
- 2.1.5 The inner Green Belt boundary around the town of Brentwood was first defined on the Town Map of the 1957 County Development Plan. The 1976 Approved Review of the County Development Plan (ARDP) significantly amended that boundary and also defined boundaries around the other main settlements.
- 2.1.6 The previously adopted 1995 Brentwood Local Plan defined first time boundaries around the smaller built up areas of Blackmore, Hook End, Stondon Massey and Mountnessing. At the same time, the ARDP boundary was reviewed in detail to ensure consistency and logic, and minor amendments were made to reflect planning consents and to comply with specific criteria.
- 2.1.7 No changes to the Green Belt boundary were proposed or adopted in the extant Brentwood Replacement Local Plan (adopted August 2005).
- 2.1.8 Whilst 89% of Brentwood Borough is Green Belt, it is also noteworthy that:
- 10% of the borough is built on (developed) – compared to a UK average of 6%;
 - 8% of the borough is Green urban (this includes formal parks, sports pitches, golf courses, etc.) – compared to a national average of 3%;
 - 76% of the borough is farmland – compared to a UK average of 57%; and
 - 6% of the borough is ‘natural’ (e.g. woodland/nature conservation) – compared to a UK average of 35%.

(Source: <http://www.bbc.co.uk/news/uk-41901294?platform=hootsuite> accessed 08/11/17)

- 2.1.9 This provides the context in which Brentwood is developing the new Brentwood Local Plan 2013 – 2033. With around 10% of the existing borough already previously developed and 89% of the borough comprising Green Belt, there is a finite amount of land available in which to deliver the required housing and employment growth over the new local plan period. This is a fundamental consideration for the ensuring the new local plan is sustainable over the plan period.

3 LONDON’S GREEN BELT: A BRIEF HISTORY

3.1 ORIGINS

- 3.1.1 The term ‘Green Belt’ has its roots in continental Europe, where ‘buffer zones’ were created to separate new development from historic towns during the 19th Century, such as in Vienna.
- 3.1.2 Proposals for a London Green Belt were pursued from 1890; however support for the notion only grew with the advent of strategic planning. The London Society published the “Development Plan of Greater London” in 1919. The London Society and Campaign for the Protection of Rural England (CPRE) lobbied to designate a circa 2 mile wide belt of land around London, largely free from development.

3.1.3 London's Green Belt took many years to implement and was first formally proposed by the Greater London Regional Planning Committee in 1935 *"to provide a reserve supply of public open spaces and of recreational areas and to establish a green belt or girdle of open space"*. Various proposals also emerged throughout the late 1930's and early 1940's, including the Greater London Plan of 1944.

3.1.4 The original proposals were that the Green Belt should form a relatively narrow area of land or a series of green spaces around London.

"Implementation [of the Green Belt] started in 1938 with the passing of the Green Belt (London and Home Counties) Act. This enabled the LCC [London County Council] to start buying land for the proposed encircling park. It was not intended to be a continuous circular area but rather a series of green spaces around London, publically owned and accessible to Londoners. Some 8,000 hectares had been bought by 1939 with another 12,150 immediately after the Second World War. This land was safeguarded absolutely from development" (source: The Green Belt: A Place for Londoners, 2015, London First)

3.2 TOWN & COUNTRY PLANNING ACT 1947

3.2.1 The Town and Country Planning Act 1947 was a defining act in the planning and control of development. It allowed for two main changes to previous laws that still define planning today:

- The Act requires planning permission for development of land, rather than land ownership alone conferring development rights; and
- It reformed the number of planning authorities, imposing a duty to prepare strategic development plans for each planning authority area.

3.2.2 The Act also allowed provision for the designation of Green Belt land and also coincided with the New Towns Act 1946, which sought to promote new settlements away from the southeast of England.

3.2.3 Whilst the 1947 Act allowed planning authorities to designate areas as Green Belt, the first Green Belts were not formally implemented until 1955, by the Conservative Minister for Housing, Duncan Sandys. At this time the purpose of the Green Belt fundamentally changed:

"This was not as a relatively narrow band of park land around London to provide public open space and recreation, as per the original vision, but rather as a barrier to London's expansion. The Minister 'indicated that even if...neither green nor particularly attractive scenically, the major function of the Greenbelt was...to stop further urban development' (source: The Green Belt: A Place for Londoners, 2015, London First)

3.3 1955 ONWARDS

3.3.1 Given the implementation of Green Belt policy from 1955 onwards, the purpose of Green Belt had been redefined to that of controlling urban growth, rather than focusing on recreational function. In 1955, this was reinforced via guidance contained in Circular 42/55.

3.3.2 With reference to Section 3.5 below, 'Planning Policy Guidance 2: Green Belt' stated that *"the*

codification of Green Belt policy and its extension to areas other than London came in 1955 with an historic circular inviting local planning authorities to consider the establishment of Green Belts”.

3.3.3 As areas of Green Belt became increasingly designated by local authorities, throughout the 1950's and 1960's, the London Metropolitan Green Belt progressively expanded outwards (increasing in area), enveloping many large built up areas outside of London. Rather than being a belt of land around London, by the end of the 1970's the London Metropolitan Green Belt had expanded such that it extended to three times the area of Greater London. As the area of designated Green Belt increased, it overlapped several boroughs including Brentwood, in its entirety.

3.3.4 This expansion was in recognition that the Green Belt was not just about preventing the outwards expansion of London, but also recognising the proximity of other towns in relation to the Greater London area and the need to prevent them from merging with Greater London.

3.4 MODERN DAY CONTEXT

3.4.1 In January 2010, CPRE and Natural England commissioned a joint report entitled 'Green Belts: A Greener Future'. This included key facts and information about The London (Metropolitan) Green Belt:

- *It is the largest of England's 14 Green Belts, covering 30% of the total area of all Green Belt land in England.*
- *92% of the Metropolitan Green Belt land is undeveloped land, but only 58% of the land is registered as being in agricultural use (compared with 71% of all land in England). There is a high prevalence of 'semi-urban' uses relying on open land, such as catteries, golf courses and pony paddocks.*
- *The Metropolitan Green Belt has a significant proportion (5,380 ha) of farmland covered by Higher Level Stewardship schemes, but a low overall proportion (51% of all land in agricultural use) of involvement in Natural England funding supporting environmentally sensitive farming ('agri-environment schemes'; the national proportion is 67%; Green Belt land overall 53%).*
- *It contains particularly important resources of both public rights of way (9,899 kilometres, or 20 metres per hectare) and woodland (18% of the overall land area). Landscape quality is being maintained in 55% of the area.*
- *This Green Belt is the most under pressure of any from proposals for new development, both in terms of infrastructure such as airports and transmission lines, and new housing.*

3.4.2 This information sets the modern day context for the London Green Belt. It is evident that the London Metropolitan Green Belt is not untouched countryside. It comprises a landscape under pressure. Whilst 92% of the Green Belt land is 'undeveloped' from an urban perspective, only 58% of land is in agricultural use. There is much pressure on the Green Belt particularly from semi-urban land uses and recreational facilities (e.g. Golf Courses). This in part reflects the relationship between urban areas within and near to Green Belt and the wider countryside and the accessibility of Green Belt land to local people.

- 3.4.3 The 2010 document asks what people would like to see more of in the Green Belt and it is reported that the public in London generally responded with more nature reserves, woodland walks and new parks. This again indicates emerging public aspirations for the Green Belt, rather than it being merely a spatial planning tool.
- 3.4.4 Currently between 13% and 22% of London’s Green Belt provides space for amenity, recreation and access.
- 3.4.5 Therefore, it is considered that the London Metropolitan Green Belt has a number of multifunctional facets including;
- Preventing the urban sprawl of London;
 - Preventing the urban sprawl of neighbouring towns which would harm openness of intervening land and encourage settlement coalescence; and
 - Increasing recreational pressures as the population in and around London continues to grow, where there is increasing accessibility to the countryside and aspiration for recreational and green space access not necessarily afforded in ‘urban’ areas.
- 3.4.6 This is further complicated by competing landuse demands in terms of agriculture, nature conservation and recreational demands.
- 3.4.7 However, as policy tool, it is generally accepted that Green Belt has achieved its aim of preventing urban sprawl and preventing settlement coalescence, preserving open areas of land between settlements: *“The Green Belt has served its post-war purpose well of preventing urban sprawl and the coalescence of towns and cities” (Merrick Denton-Thompson president of the Landscape Institute, October 2016).*

3.5 RECENT AND CURRENT PLANNING POLICY OVERVIEW

PLANNING POLICY GUIDANCE 2: GREEN BELTS

- 3.5.1 From around 1988 to 2012, planning policy in relation to Green Belt was guided by PPG2, which stated:

Planning Policy Guidance 2 (‘PPG2’) outlines the history and extent of Green Belts and explains their purposes. It describes how Green Belts are designated and their land safeguarded. Green Belt land-use objectives are outlined and the presumption against inappropriate development is set out.

- 3.5.2 PPG2 defined the aim and purposes of the Green Belt land in planning policy terms:

“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. Green Belts can shape patterns of urban development at sub-regional and regional scale, and help to ensure that development occurs in locations allocated in development plans. They help to protect the countryside, be it in agricultural, forestry or other use. They can assist in moving towards more sustainable patterns of urban development (see paragraph 2.10).

There are five purposes of including land in Green Belts:

1. *to check the unrestricted sprawl of large built-up areas;*
2. *to prevent neighbouring towns from 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."*

3.5.3 Additionally, PPG2 further defined the 'use' of land in Green Belts:

"Once Green Belts have been defined, the use of land in them has a positive role to play in fulfilling the following objectives:

- *to provide opportunities for access to the open countryside for the urban population;*
- *to provide opportunities for outdoor sport and outdoor recreation near urban areas;*
- *to retain attractive landscapes, and enhance landscapes, near to where people live;*
- *to improve damaged and derelict land around towns;*
- *to secure nature conservation interest; and*
- *to retain land in agricultural, forestry and related uses.*

The extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt, or in its continued protection. For example, although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection. The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over the land use objectives."

3.5.4 PPG2 also made clear that Green Belt boundaries were permanent and could only be '*altered in exceptional circumstances*'. There was a presumption against inappropriate development (anything considered harmful to the purposes of the Green Belt), with a number of exceptions which need not necessarily be inappropriate in the Green Belt, e.g. minerals development.

3.5.5 As such, PPG2 set out much of the modern day public understanding of the purposes and aims of the Green Belt.

NATIONAL PLANNING POLICY FRAMEWORK (2012)

3.5.6 PPG2 was officially revoked in 2012 when the National Planning Policy Framework ('NPPF') was adopted. The NPPF incorporated much of the guidance from PPG2, but arguably provided greater focus on the purposes of the Green Belt without emphasising land use objectives.

3.5.7 Section 9 of the NPPF sets out current national planning policy on 'Protecting Green Belt land':

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of

Green Belts are their openness and their permanence.

Green Belt serves five purposes:

- 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.*

Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

- 3.5.8 NPPF makes clear that the extent of Green Belt in England is largely established and new Green Belt should only be created in exceptional circumstances. The key principle that local authorities are required to adhere to is:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”

- 3.5.9 The NPPF also reiterates what types of development are also not inappropriate in the Green Belt.

- 3.5.10 This is in the context that the NPPF recognises that it is important to provide *“the supply of housing required to meet the needs of present and future generations”*. New housing development and urban growth is not considered appropriate development in the Green Belt. This is a fundamental planning consideration that requires strategic planning decisions by local authorities to balance the level of housing provision required and protecting the Green Belt.

3.6 BRENTWOOD REPLACEMENT LOCAL PLAN – SAVED POLICIES (AUGUST 2008)

- 3.6.1 Current extant local planning policy in Brentwood is defined by the saved policies of the Brentwood Replacement Local Plan. There are a number of policies relating to Green Belt, but the overarching policy position in the extant local plan is defined by Policy GB1 New Development:

“Within the Green Belt, as defined on the proposals map, planning permission will not be given, except in very special circumstances, for changes of use of land or the construction of new buildings or extension of existing buildings, for purposes other than those appropriate to a green belt, or for the re-use of existing buildings that do not comply with the criteria set out in policies GB15 and GB16.

All proposals will additionally, where they apply, be judged against the other policies in this plan”.

3.6.2 Policy GB2 (Development Criteria) requires that:

“When considering proposals for development in the Green Belt, the local planning authority will need to be satisfied that they do not conflict with the purposes of including land in the green belt and do not harm the openness of the green belt”.

4 LONDON GREEN BELT AND THE FUTURE

4.1 HOUSING WHITE PAPER 2017

4.1.1 Government published the Housing White Paper in February 2017 – ‘Fixing our broken housing market’.

4.1.2 Two key parts of the White Paper are ‘Planning for the right homes in the right places’ and ‘Building Homes Faster’. The Government makes a number of proposals which, in summary, are considered to focus on:

- Ensuring every local authority has an up to date local plan;
- Ensuring the housing requirements of all local authority areas are fully accounted for and can be delivered;
- Ensuring land can be released for housing development;
- Ensuring both developers and local authorities can be held to account to ensure housing numbers are delivered; and
- Improving the affordability and diversity of the housing market

4.1.3 The Government proposes to *“maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements”.*

4.1.4 It is clear that Greater London and neighbouring authorities are subject to greater demand for housing with associated pressures on the availability of developable land.

4.1.5 The purpose of the London Metropolitan Green Belt has been to restrict the expansion of outward growth of Greater London and neighbouring towns (within the Green Belt), whilst encouraging regeneration of previously developed areas. Depending on the availability of Brownfield land for redevelopment, it is recognised that the purposes of the Green Belt can also conflict with local planning requirements relating to the supply of housing and other development growth. Planning authorities must seek to address such conflicts through the development of their local plans and strategic / spatial planning decisions.

Planning for the right homes in the right places: consultation proposals

4.1.6 Further to the White Paper, Government undertook a consultation between 14th September 2017 and 9th November 2017 on *‘further measures set out in the housing white paper to boost housing supply in England’*. The consultation set out new proposals in relation to calculating housing need.

4.1.7 In relation to Green Belt the consultation makes a number of statements:

“The housing White Paper ...reiterated strong protections for the Green Belt and other environmental designations, and set out proposals to make sure that we build high quality homes in which people want to live...”

*“The National Planning Policy Framework is clear that, to enable effective planning of new homes, local planning authorities should start the plan-making process with a clear understanding of the number of new homes that they need in their area. While this is an essential first step, it is not the only stage in the process. Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, **the Green Belt**, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest...” [underline our emphasis]*

“This new method for assessing local housing need will affect individual authorities differently. Alongside this consultation document, we are publishing the housing need for each local planning authority using our method, on the basis of current data (average household growth for 2016 to 2026 and house price to earnings ratios for 2016). It also sets out, indicatively, the extent to which land in each local authority area is covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. This is for illustrative purposes only - the data informing this new method is based on the most up-to-date information available at the time of publishing this consultation document, and will change between now and when local authorities produce plans.” [underline our emphasis]

“Local planning authorities without an up-to-date local plan or spatial development strategy would not be able to factor land constraints into the baseline for establishing their five year land supply. However, when determining individual planning applications, the decision-maker will still need to take account of all policies in the National Planning Policy Framework, including those which restrict development (such as Green Belt and Ancient Woodland).”

4.1.8 Notwithstanding housing need, Local Planning Authorities must also strategically plan for employment use, infrastructure, health and education provision and gypsy and traveller requirements.

4.1.9 As such, in relation to the London Metropolitan Green Belt, local authorities must plan positively to meet their Objectively Assessed Housing Need (and other development requirements), whilst recognising that the Green Belt is a constraint and restricts development. When preparing new Development Plans, Local Planning Authorities must comply with national policy and guidance in relation to Green Belt whilst balancing housing need requirements and other development requirements.

4.1.10 Therefore, it is considered that Purpose 5 of the Green Belt (see 3.5.7) remains a critical spatial planning consideration at the outset of the Local Plan-making process, in that Local Plans should encourage urban regeneration and the recycling of derelict and other urban land by ensuring all housing is directed to non-Green Belt land in the first instance.

4.2 COMMENTARY ON POTENTIAL FUTURE OF THE GREEN BELT

4.2.1 The Greater London Authority has published a series of population and household projections for the coming years. Key findings include:

- *Based on the short-term migration scenario the total population of Greater London is projected to rise by 2.35 million between 2014 and 2041 to reach 10.89 million. In comparison the long-term migration scenario projects a rise of 1.96 million to reach 10.50 million by 2041.*
- *London's population is projected to reach 10 million in 2029 under the short-term scenario and 2033 under the long-term scenario.*
- *All boroughs are projected to see a rise in their population between 2014 and 2041 under both sets of projections. Under the short-term migration scenario, this proportional rise is projected to be greatest in Barking and Dagenham (a rise of 40.1 per cent) and lowest in Kensington & Chelsea (11.5 per cent). For the long-term scenario, Redbridge (31.8 per cent) and Islington (15.1 per cent) are projected to see the highest and lowest levels of growth respectively. City of London is excluded from these figures.*

(Source: <https://www.london.gov.uk/what-we-do/research-and-analysis/people-and-communities/population-projections> accessed 08/11/17)

4.2.2 There is ongoing debate as to how the projected population increases can be accommodated in and around London in terms of housing and wider development requirements (including infrastructure). Part of this debate relates to protection of the London Metropolitan Green Belt, its future and how far it currently constrains development required to serve the projected population increases in London (and neighbouring authority areas).

4.2.3 In 2014 the London Society, who in 1919 promoted the concept of the Green Belt, published "*Green Sprawl – our current affection for a preservation myth*" in which it was argued that new development will require land currently within the London Metropolitan Green Belt. In 2016, they published "*Re/Shaping London: Unlocking Sustainable Growth in West London and Beyond*" which the London Society states:

"...sets out a radical agenda for change across England. It includes proposals for a new 'Green Web' to be introduced to replace the 'Green Belt'. Exploring the scope for change in the west of the capital, suggesting that a West London 'Green Web' could alone accommodate 100,000 new homes (equivalent to four new towns!) and includes demands for a new Garden City at Northolt Airport, new suburban railway and suburban densification".

4.2.4 The report author states that "*Designation of a Green Web in London would involve the transformation and modernisation of land currently defined as Green Belt to secure a multi-function Green Infrastructure landscape*".

4.2.5 In January 2016, The Adam Smith Institute released papers stating:

- *London and surrounding counties need at least one million new homes in the next ten years to meet housing demand, and to stop rents and house prices from soaring higher.*
- *Many of these new homes will have to come on greenfield or Green Belt sites because not*

enough suitable brownfield land exists; we estimate that this will require roughly 20,000 hectares of green belt space.

- *Almost the full amount of space (20,000ha) can be found within a 10 minute walk – 800m – of existing commuter train stations.*
- *This paper explores some of the best areas to build on low quality Green Belt around London. Locations include: East of Theydon Bois station, around Redbridge, Pinner Park Farm in Harrow, and some of the hundreds of Green Belt golf courses.*

(Source: <https://www.adamsmith.org/news/press-release-new-paper-reveals-where-londons-green-belt-must-be-built-on-to-curtail-housing-crisis> accessed 08/11/17)

- 4.2.6 The Landscape Institute (a royal chartered professional body) has agreed that Green Belt should be a key policy priority in the future. It commissioned the ‘Future of the Green Belt’ member consultation in 2015. This raised a number of policy considerations in terms of how Green Belt policy develops in the 21st Century, noting the competing pressures for housing growth and that it was likely that Green Belt release would be required to meet housing demands.
- 4.2.7 Work by the Landscape Institute is ongoing but, in brief, they wish to collaborate across the built environment professions to ensure Green Belt is fit for the 21st Century and plan for a *“positive and strengthened Green Belt that can deliver a multi-functional landscape”* (Merrick Denton-Thompson president of the Landscape Institute, October 2016). Key questions the Landscape Institute raise are in relation to opportunities for the Green Belt including building on existing protections, promoting sustainable development, green infrastructure led approaches and the need for Green Belt management plans.
- 4.2.8 In 2015, London First, published *“The Green Belt: A Place for Londoners”*. In this, it was concluded that:

“London must continue to protect its valuable green spaces and beautiful open countryside but this is wholly compatible with seeing how the Green Belt can play a small part in helping to accommodate the new homes that London needs.

London’s boroughs should be encouraged to review their Green Belt and consider how the land within it can be most effectively used and what the options are for re-designating a small fraction for new homes”.
- 4.2.9 Whilst there are a number of ‘progressive’ discussions in relation to how the Green Belt is considered moving forward, in the context of development pressures, it should be noted that extant national planning policy states *“the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.*
- 4.2.10 Government still seeks to ensure strong protections for the Green Belt and the policy designation is highlighted as a key consideration and constraint to development.
- 4.2.11 A Private Members Bill is expected to have its second reading in Parliament on 1st December 2017. The Green Belt (Protection) Bill 2017-19 seeks to establish a *“national register of green belt land in England; to restrict the ability of local authorities to de-designate green belt land; to make provision*

about future development of de-designated green belt land; and for connected purposes”.

4.2.12 In July 2017, CPRE published “*Green Belt Under Siege*”. In the report, CPRE research indicates that:

- *housing development proposed for the Green Belt in local plans has shot up by another 150,000 to 425,000 houses since our previous report (March 2016) the number of planning applications being approved year on year on greenfield sites in the Green Belt has nearly doubled since the NPPF came into force in 2012*
- *Green Belt boundaries are now being changed to accommodate housing at the fastest rate for at least two decades*
- *at least 800 hectares of greenfield land in the Green Belt have been developed for a range of commercial or industrial projects, such as offices or retail parks, since 2009*
- *nearly three-quarters of the housing proposed on land to be released from the Green Belt will be unaffordable for most people living in the local area: planning consultants Glenigan found only 16% of homes built in Green Belt since 2009 were affordable*
- *with the New Homes Bonus, the Government is providing financial incentives that significantly increase Green Belt release and development, contrary to its own commitments.*

4.2.13 CPRE recommends that Government should:

- *make it clearer that unnecessary or major losses of Green Belt should be avoided;*
- *make sure that Green Belt boundaries are reviewed no more than every 15 years –the recommended life of a typical local plan;*
- *reaffirm that high levels of housing demand or housing targets do not in themselves amount to the “exceptional circumstances” required to justify changing Green Belt boundaries;*
- *abandon current methods of calculating housing need that serve to unrealistically inflate housebuilding requirements, such as adjustments to account for so-called “market signals”;*
- *where there is a particularly acute need for affordable housing in Green Belt areas to meet local needs, give more support to small scale, locally led “rural exception site” schemes that are well designed to minimise Green Belt harm; and*
- *remove New Homes Bonus funding from development in the Green Belt, and nationally protected landscapes, that either does not meet local needs (as clearly distinct from market demand) or does not involve the regeneration of suitable brownfield land.*

4.2.14 The London Green Belt Council is calling for a halt to the wide-scale release of London’s Green Belt and halt the number of ‘Green Belt Reviews’. They consider housing target assessments are flawed and state that *“there are 218,000 planning permissions yet to be built and swathes of brownfield land which could accommodate at least 300,000 homes in London alone lying idle”* (Source: <https://londongreenbeltcouncil.org.uk/our-message/> accessed 10/11/17).

4.2.15 Such competing pressures are also in the context that whatever the relationship between housing and the Green Belt, there are also pressures, from an increasing population, on access to green space and countryside recreation. Historically, the aspirations for and public perception of the Green Belt has become increasingly linked to recreation and rural pursuits, in part due to the policy position advocated in PPG2, in terms of objectives for Green Belt improvements.

5 SUMMARY AND CONCLUSION

5.1.1 This report does not advocate any policy position in relation to the Green Belt. The purpose of the report is to outline the context of the history and implementation of Green Belt policy, and the context of the London Metropolitan Green Belt within which Brentwood Borough is wholly located.

5.1.2 The role and implementation of the Green Belt has evolved over many years, both in terms of its development planning function but also public perception and expectations. The London Metropolitan Green Belt has grown significantly since 1955 and is a policy consideration for numerous Local Planning Authorities.

5.1.3 It is clear that there are competing pressures between the protection of the Green Belt and ensuring the supply of housing (and other development requirements), particularly in relation to high growth areas around London.

5.1.4 This is the context against which the new Brentwood Local Plan is being developed. The local plan requires a balanced approach which accounts for Objectively Assessed Housing Need, whilst protecting the function and purposes of the Green Belt. It should be recognised that the London Metropolitan Green Belt currently has a number of multifunctional facets including (but not limited to):

- Preventing the urban sprawl of London;
- Preventing the urban sprawl of neighbouring towns which would harm openness of intervening land and encourage settlement coalescence; and
- Increasing recreational pressures as the population in an around London continues to grow, where there is increasing accessibility to the countryside and aspiration for recreational and green space access not necessarily afforded in 'urban' areas.

5.1.5 The new Brentwood Local Plan must accord with the requirement of the NPPF (2012) and the Housing White Paper 2017 reaffirms that Government proposes to:

“maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements”.

5.1.6 Therefore, it is considered that Purpose 5 of the Green Belt (see 3.5.7) remains a critical spatial planning consideration at the outset of the Local Plan-making process, in that Local Plans should encourage urban regeneration and the recycling of derelict and other urban land by ensuring all development is directed to non-Green Belt land in the first instance.

5.1.7 However, options for development must also take account of various sustainability criteria,

strategic priorities and infrastructure requirements, noting that around 10% of Brentwood Borough is previously developed and 89% of the borough is Green Belt. In order to strategically plan for development over the period 2013-2033, the emerging local plan needs to consider both the capacity of the existing settled areas to accommodate new development (including regeneration potential), as well as the wider capacity of Brentwood Borough as a whole.

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Green Belt Study Part II: Green Belt Parcel Definition and Review

10 November 2017

SUMMARY NOTE OF WORKING DRAFT

As extracted by Brentwood Borough Council
Full report produced by Crestwood Environmental Ltd.

1. INTRODUCTION

- 1.1.1 In 2016, following consultation on the 'Draft Local Plan 2013-2033' Brentwood Borough Council (the Council) commissioned Crestwood Environmental Ltd. to undertake a Borough wide Green Belt review to be considered as part of the evidence base to inform the new Local Plan.
- 1.1.2 Overall, the Council has commissioned a series of studies and reports that will form a four part Green Belt evidence base to inform the Brentwood Local Plan 2013 – 2033. All of these studies have evolved over time and comprise:
- Part 1: Brentwood Green Belt in Context – High level historic and functional review of the London Metropolitan Green Belt, and the context against which the Brentwood Local Plan 2013-2033 is being developed;
 - Part 2: Green Belt Parcels Assessment - Borough-wide definition and relative assessment of Green Belt parcels against the five purposes of the Green Belt;
 - Part 3: Individual Sites Assessment (HELAA sites, lesser performing GB parcels and other identified sites) – A relative assessment of potential Site Allocations against the five purposes of the Green Belt. This assessment process is split into two sections, the first considering individual sites and the second reflecting on cumulative impacts of potential allocations;
 - Part 4: Partial review of Settlement Boundaries and Green Belt edge – focused review of existing settlement boundaries (and associated Green Belt definition) using study evidence.
- 1.1.3 This note provides a summary of emerging findings from the working draft Stage 2: Green Belt Review; as extracted by Brentwood Borough Council from the working draft report produced by Crestwood Environmental Ltd. (November 2017).

THE BRIEF

- 1.1.4 The brief is to assess the level of contribution of general land areas (referred to as 'Green Belt Parcels') adjacent to the existing Green Belt boundary within Brentwood Borough, to fulfilling the purposes of the Green Belt on a strategic level to provide sufficient evidence for Brentwood Borough Council to determine preferred Green Belt boundaries and areas in the Local Plan.

2. METHODOLOGY AND PROCESS

GUIDANCE

- 2.1.1 There is no definitive method for carrying out an assessment of effects that potential development may have on the purposes of the Green Belt. As such, a bespoke methodology has been designed that is aimed at meeting the requirements of the Brief and is based on other precedent studies published from across the UK.

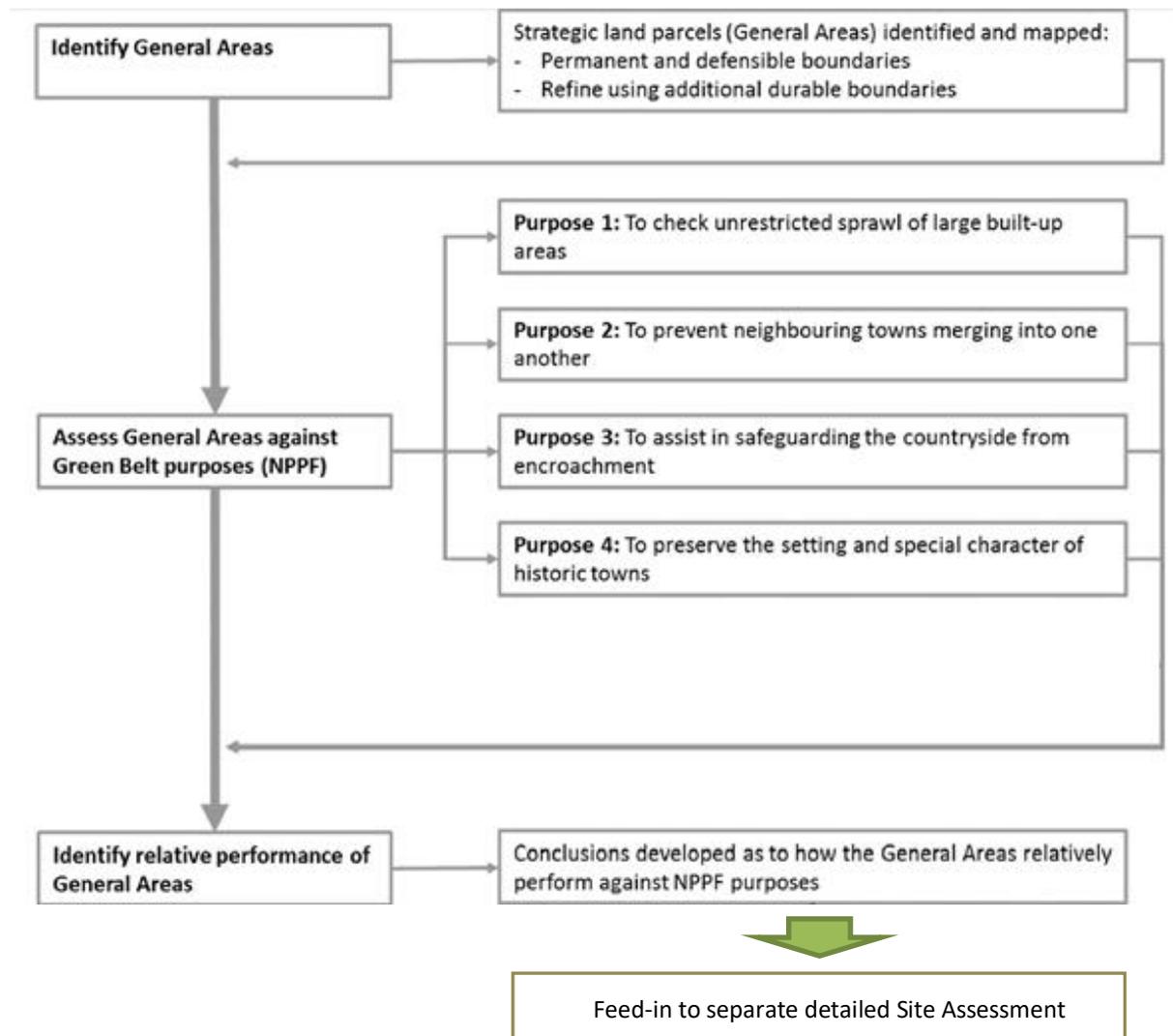
2.1.2 As far as practical, the process is periodically reviewed in light of other published methodologies and the outcomes of other local plan reviews and ‘Examinations’ and will be fed in to the final submission reports.

PROCESS OVERVIEW

2.1.3 As the assessment is intended to be strategic, the methodology and assessment process is intended to be able to be adopted by adjacent authorities and to be used as a basis for further detailed analysis.

- 2.1.4 The Assessment process is undertaken in two main (but iterative) stages:
1. Identifying and assessing Green Belt Parcels; followed by
 2. More detailed assessment of sub-Parcels (as appropriate to the findings of stage 1).

2.1.5 A systematic process was undertaken, using the stages shown below, in order to complete the assessment:



2.1.6 For the purposes of the parcel assessment, Purpose 5 has not been considered to require detailed or further assessment as it is assumed that all Green Belt land fulfils the purpose and the principle of the Brentwood Local Plan 2013-2033 is that in the first instance all

development be directed to non-Green Belt land in the first instance, in accordance with national planning policy.

2.1.7 The assessment process is undertaken in the following key stages:

1. Determine the precise methodology, criteria and definitions with input from Brentwood Borough Council;
2. Distribute the methodology and approach to the adjacent authorities for comment and discuss at a subsequent stakeholder meeting;
3. Establish the initial broad Green Belt Parcels within Brentwood Borough for assessment;
4. Assess the Green Belt Parcels against set criteria in relation to the purposes of the Green Belt in a way which would allow comparison and inform the parallel individual site assessment (the Part 3 study); and
5. Disseminate the initial results and advise on any further detailed analysis requirements (e.g. refining the Green Belt Parcel size, or splitting into sub-Parcels) and refining the assessment as required.

2.1.8 Additionally, the assessment process and parcels will be refined to consider the potential extent of Green Belt parcels beyond the Brentwood Borough Boundary. Whilst Brentwood can only define Green Belt within its own administrative area, in some locations, the land or parcel forms part of a wider area of Green Belt falling between settlements in Brentwood and neighbouring boroughs. It is also the case that in places the existing Brentwood Borough Boundary does not form a defensible Green Belt boundary. Whilst reference may be paid to cross-boundary issues in the initial assessment, this can be reviewed in light of parcel definition where appropriate, immediately outside the Brentwood borough boundary.

2.1.9 The final Green Belt Parcel Assessment will account for these considerations in a proportionate way, accounting for any stakeholder engagement with neighbouring authorities, in accordance with requirements under Duty to Cooperate.

IDENTIFICATION OF GREEN BELT PARCELS

2.1.10 Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus, permanent man-made and natural features were selected as the initial basis of criteria for the identification of the Green Belt Parcels. In particular, the boundaries of the general areas were primarily based on the features that were either motorways, A and B Roads, operational railway lines or rivers.

2.1.11 Given the extremes of urban and rural found in the study area from the semi-urban fringes to the relatively open countryside, a more flexible approach to the identification of Green Belt Parcels for assessment was necessary. This was achieved through the further division of some Green Belt Parcels using additional durable boundary features such as:

- Unclassified public roads and private roads;
- Smaller water features, including streams, canals and other watercourses;

- Prominent physical features (e.g. ridgelines);
- Existing development with strongly established, regular or consistent boundaries; and
- Protected woodland or hedgerows.

2.1.12 Any Green Belt Parcels whose existing physical boundaries were not considered to be 'permanent and defensible', would be reviewed through the iterative overall process, such that a suitable revision to the Green Belt boundary could be proposed.

DETERMINATION OF THE ASSESSMENT CRITERIA

2.1.13 In order to identify the criteria for assessment, the primary reference point for understanding and interpreting the aims, essential characteristics and purposes of the Green Belt are contained within the National Planning Policy Framework (NPPF) (Department for Communities and Local Government, 2012) and the Replacement Local Plan (Brentwood Borough Council, 25 August 2005 (Adopted)).

2.1.14 The NPPF states that *'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open'*.

2.1.15 It also states that *'the essential characteristics of Green Belts are their openness and their permanence'*.

2.1.16 The NPPF states that the *"Green Belt serves five purposes:*

- 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."*

2.1.17 The NPPF does not state whether one purpose is more important than another.

2.1.18 Paragraph 81 of the NPPF states that *"local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."*

2.1.19 'Purpose 5' has not been assessed as it has already been outlined that development will be directed towards land not contained within the Green Belt in the first instance. Development on Green Belt land will only be considered where the strategic priorities of the Borough to accommodate new housing, employment and/or mixed use development land necessitates its release from Green Belt, accounting for all other planning, environmental and strategic considerations.

2.1.20 Based on the objectives of and the opportunities provided by the Green Belt, each *purpose* was considered in turn with regard to the assessment criteria to establish how well

the Green Belt Parcels being considered as part of the assessment fulfilled the role of the Green Belt. These criteria are set out below:

Purpose 1: To check the unrestricted sprawl of large built-up areas

2.1.21 In general terms, a measure for this purpose would be whether a Green Belt Parcel is:

- Located adjacent to a ‘large built up area’; and
- The degree to which it is contained by built form, the nature of this containment, linkages to the wider Green Belt and the extent to which the edge of the built up area has a strongly defined, regular or consistent boundary

Definition	Description
Well-Contained (WC)	<p>Within a large built-up area.</p> <p>Would constitute ‘Infilling’.</p> <p>Strong settlement boundaries on most sides of the Green Belt Parcel, in combination with other Strong boundaries.</p> <p>Limited or no countryside encroachment or interrupted views across the landscape.</p>
Partly-Contained (PC)	<p>At least two boundaries or around half of the Green Belt Parcel boundary abuts a large built-up area without containment, with Weak boundaries on remaining sides of the Green Belt Parcel, <u>or</u>;</p> <p>Where a Green Belt parcel clearly abuts a large built up area and the remainder of the parcel is clearly delineated by Strong boundaries.</p> <p>Would form a settlement extension rather than ‘infilling’.</p> <p>Some countryside encroachment, relative to scale of existing large built up area and some interrupted views across the landscape may occur.</p>
Not Contained (NC)	<p>Not adjacent to, or would be weakly associated with, existing large built-up area.</p> <p>Substantial physical separation of new settlement/housing/employment/mixed use development from large built up area. Areas separated from the natural edge of a large built-up area by Strong boundary – i.e. would be beyond the pre-existing natural development limits of the large built-up area.</p> <p>Significant countryside encroachment, both in terms of the physical area and relative to the existing settlement may occur, and in relation to interrupted views across the landscape.</p>

2.1.22 Where there is some overlap in terms of the criteria whereby a Green Belt Parcel does not wholly fall within one criteria definition, multiple criteria may be selected and sound professional judgement used to most appropriately categorise the Green Belt Parcel in relation to Purpose 1.

Purpose 2: To prevent neighbouring towns merging in to one another

2.1.23 The main method of assessing the contribution that a Green Belt Parcel makes with regard to fulfilling this purpose relates to the distance between neighbouring towns. The shorter the distance between towns the more susceptible the settlement pattern will be to coalescence through development.

Definition	Description
Separation Retained (SR)	Where very large countryside gaps exist between towns; no intervisibility. Large number of significant interlying features visually restrict perceived impacts from development. Development will not lead to merging of towns or significantly reduce the countryside 'gap'. NB: Development may lead to isolated houses becoming part of or closer to the town.
Separation Reduced, but Functional (SRF)	Significant countryside gaps exist between towns, risk of reduction not significant. Green Belt Parcel development would narrow gap between towns without (visual or physical) merging. Existing interlying barriers can be maintained; scope to mitigate perceived merging of settlements. NB: Development may lead to isolated houses becoming part of or closer to the town.
Significant Separation Reduction (SSR)	Moderate-sized but important gap between towns, significant reduction of countryside gap. Gap reduction such that potential risk for future town coalescence high. Potential increased visibility between towns. Scope for some limited partial development of the Green Belt Parcel where visual barriers exist without risk of towns merging.
Negligible or No Separation (NNS)	Green Belt Parcel entirely (or almost) is the gap between two or more towns. Unacceptable physical merging of towns or distance between towns decreased to a very short distance. No or few visual barriers between towns such that development would visually merge settlements.
Not Applicable (N/A)	Green Belt Parcel (likely to be small), is contained within an existing town (e.g. infilling) and would not lead to a reduction in the distance between two or more distinct towns.

2.1.24 Where there is some overlap in terms of the criteria whereby a Green Belt Parcel does not wholly fall within one criteria definition, multiple criteria may be selected and sound professional judgement used to most appropriately categorise the Green Belt Parcel in relation to Purpose 2.

Purpose 3: To assist in safeguarding the countryside from encroachment

2.1.25 The primary assessment in relation to Purpose 3 relates to the appropriateness of the land use in relation to what would be considered to be countryside.

2.1.26 Whilst the NPPF does not outline what appropriate land uses should be within the countryside and Green Belt, appropriate land uses are considered to be ones which promote access, outdoor sports and recreation and retention and enhancement of the landscape, visual amenity and biodiversity in accordance with the five purposes of the Green Belt. For the purposes of this report, the following land uses, activities or functions are considered to be suitable for the countryside and so loss of these to other development in areas of countryside would be considered to be encroachment:

- Agriculture.
- Forestry/Woodland.
- Dunes.
- Access (Access land, land with PRow's, permissive and informal access).
- Cemeteries.
- Equine Uses.
- Parkland.
- Former landfill/mineral sites where used for agriculture, nature and/or recreational uses.
- Nature (nationally/locally designated Sites and non-designated 'wild' sites).
- Outdoor Sport/Recreation/Amenity Space (taken to be open air activities without the need for large build development).
- Open Land occupied by the MoD, e.g. airfields.

Definition	Description
Limited Countryside Functions (LCF)	Green Belt Parcels where the majority of the existing land use is considered an inappropriate land use with regard to Green Belt policy and which do not contribute to the functional countryside. Limited or no public access.
Mixed Functions within Countryside (MFC)	Where the Green Belt Parcel contains some appropriate land uses but also some inappropriate elements, land use or development and where countryside functions are provided alongside other land-uses. Some public access afforded.
Functional Countryside (FC)	Green Belt Parcels where the majority of the existing land use is considered an appropriate land use with regard to Green Belt policy and which contribute strongly to the functional countryside. High degree or important public access.

2.1.27 In general terms, Green Belt Parcels with appropriate countryside land uses may be desirable to be protected from development in order to fulfil the objective of Purpose 3. The purpose of this element of the assessment has not been to rate the quality of the individual landscape elements, just to define whether the land-use and character would change from that considered consistent with functional countryside.

Purpose 4: To preserve the setting and special character of historic towns

2.1.28 In the NPPF, Chapter 12: Conserving and enhancing the historic environment states that *“local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:*

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *The desirability of new development making a positive contribution to local character and distinctiveness; and*
- *Opportunities to draw on the contribution made by the historic environment to the character of a place.”*

As such Green Belt Parcels were categorised as indicated below:

Definition	Description
Limited Relationship with Historic Town (LRHT)	The Green Belt Parcel is not adjacent to or is unlikely to affect the setting of a Historic Town. There is no or very limited potential for other Conservation (Heritage) Designations to be adversely affected by development.
Moderate Relationship with Historic Town (MRHT)	Development of the Green Belt Parcel is close to or could affect the setting of a Historic Town. There is potential for other Conservation (Heritage) Designations to be adversely affected by development, e.g. a Conservation Area.
Strong Relationship with Historic Town (SRHT)	The Green Belt Parcel is adjacent to or will affect the setting of a Historic Town.

Overall Assessment Rating

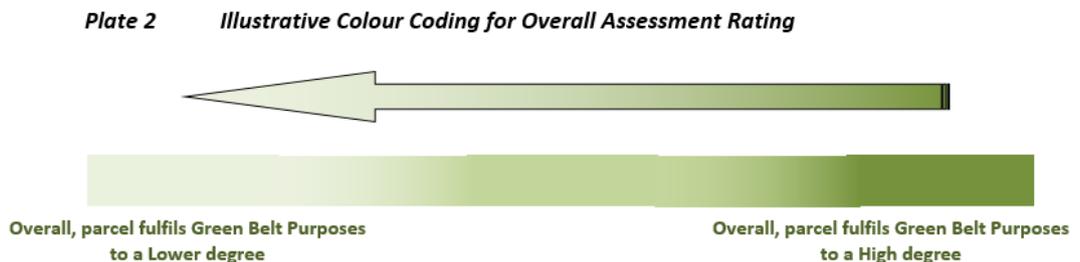
2.1.29 An overall contribution of the Parcel to the Purposes of the Green Belt is given at the bottom of each summary sheet, rated Low through to High – where the higher the rating the greater the contribution of the Parcel in terms of fulfilling the Purposes of the Green Belt. The overall rating is not intended to convey whether the land is valuable Green Belt land or not, it is an overall rating to indicate to what relative extent each Site fulfils the assessed four Purposes of the Green Belt, to allow a comparison between the Parcels to be made. In terms of assessing the suitability of built development within a Parcel, further consideration would need to be given to the strength of each individual Green Belt purpose to the particular locality. Table 6 below outlines the overall rating criteria used.

Table 1 Overall Assessment Rating

Assessment Rating	Overall Assessment Description
Low	<p>Parcel currently fulfils few Purposes of the Green Belt or fulfils a number of Purposes to a limited level and development of the Parcel will not significantly affect its contribution to Green Belt Purposes.</p> <p>No more than one High assessment level received, where Purpose 2 is not currently fulfilled at all (e.g. development would constitute infilling within a town) and other Purposes limited to a Low level; or</p> <p>One Purpose is assessed to Moderate level and all other Purposes are limited to a Low level.</p>
Low - Moderate	<p>Intermediate/borderline assessment between Low and Moderate.</p> <p>Generally , no more than one Green Belt Purpose is assessed to a High level, with all other Purposes limited to a Low level; or</p> <p>Up to two Purposes assessed to a Moderate level and two Purposes l to a Low Level.</p>
Moderate	<p>Development of the Parcel will Moderately affects the Parcel’s contributions to the Purposes of the Green Belt.</p> <p>Three, or all, Green Belt Purposes assessed to a Moderate level; or</p> <p>One Purpose of the Green Belt is assessed to a High level and at least two Purposes are assessed to a Moderate Level; or</p> <p>Two Purposes are assessed to a High level and the other two Purposes limited to a Low level.</p>
Moderate - High	<p>Intermediate/borderline assessment between Moderate and High.</p> <p>Where two Purposes of the Green Belt are assessed to a High level and no more than one Purpose is assessed to a Moderate level (with the other Purpose being limited to a Low level).</p>
High	<p>Generally, development of the Parcel will significantly affect the Parcel’s contribution to the Purposes of the Green Belt.</p> <p>At least three Purposes of the Green Belt have been assessed to a High level, or where two purposes are assessed at a High level (with another purpose assessed at a Moderate level) and professional judgement has been used in the overall assessment rating by virtue of Parcel scale, locality and ‘borderline’ assessment results .</p>

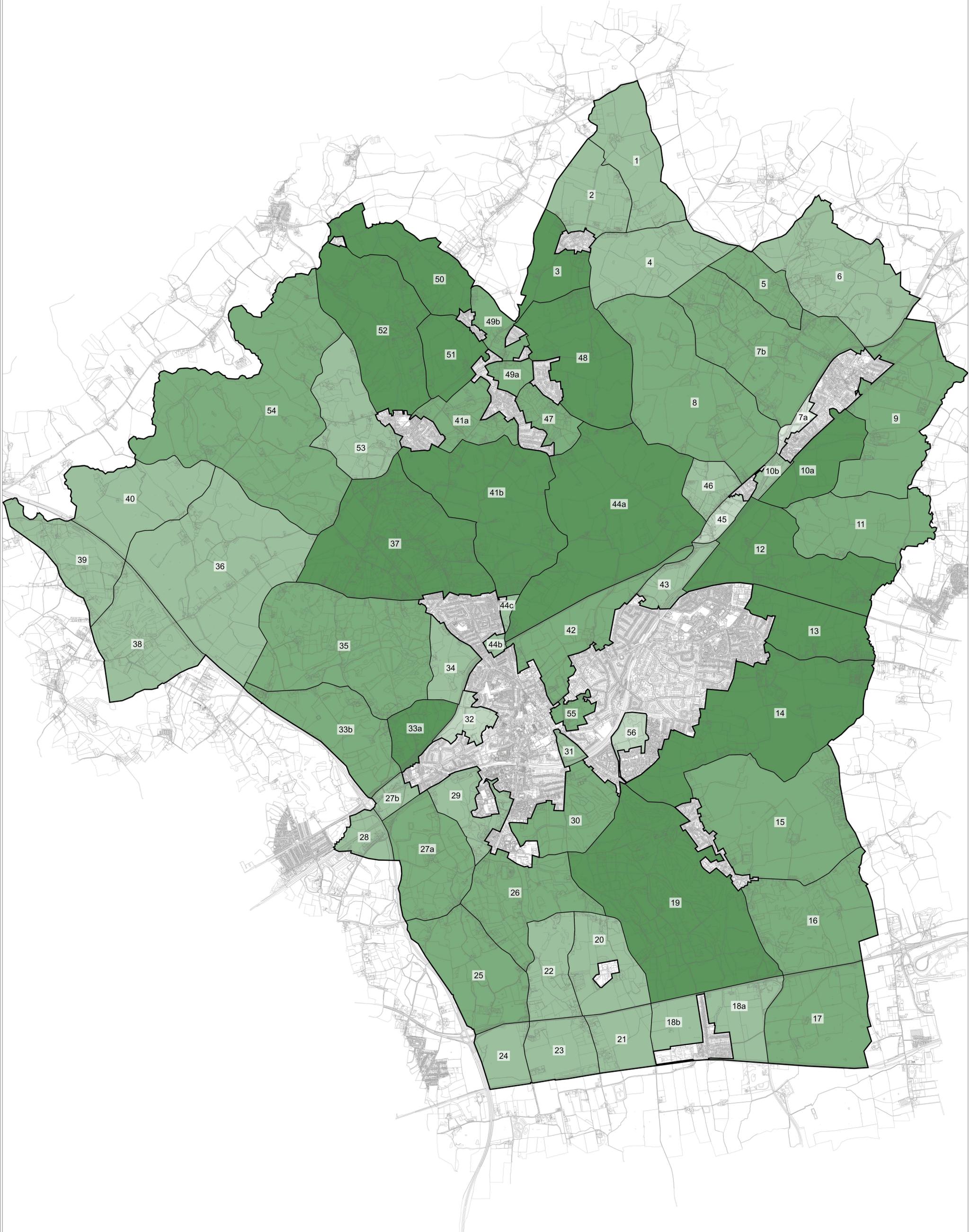
3. PRESENTATION OF FINAL ASSESSMENT

- 3.1.1 For each Parcel, the full report will contain a detailed assessment sheet pro forma, used to illustrate the key findings from the Desk Study and Fieldwork and the assessment of how far the Parcel meets the purposes of the Green Belt.
- 3.1.2 Key characteristics of each Parcel, including size, land use, access, will be recorded in the full report. The four purposes of the Green Belt are raised as questions, with a description of the judgement made in relation to the relevant criteria, as outlined above, alongside the record of the assessment rating for the Parcel in relation to categorisation process.
- 3.1.3 It is noted that some Parcels will highly fulfil one purpose but other purposes may not be fulfilled to the same level. Each purpose is considered to be equally important in terms of the functions of the Green Belt. The assessment rating for each purpose assesses the relative importance or 'contribution' of the Parcel to fulfilling a specific purpose of the Green Belt according to the assessment criteria.
- 3.1.4 Detailed assessment of parcel results is to be included in the full report together with recommendations. For the purposes of this summary note and in presenting a summary of emerging findings, the 'Overall Contribution of Parcels to Green Belt Purposes Plan' has been extracted from the full working draft report (refer to Figure 2, Appendix 1).
- 3.1.5 For Figure 2, the darker the green the greater the contribution the parcel makes to fulfilling Green Belt purposes.



- 3.1.6 It has not been the objective of this assessment to make an overall judgement in relation to Green Belt policy, nor assess the relative importance of each purpose. Each purpose is assumed to be as important as each other. The assessment is to guide the housing strategy of the developing Brentwood LDP in relation to potential effects on the purposes of the Green Belt.
- 3.1.7 Where there is any ambiguity in the assessment levels, a precautionary or 'worst-case' approach has been adopted.

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Legend:

- Green Belt Parcel
- Overall Green Belt Contribution:
 - High
 - Moderate-High
 - Moderate
 - Low-Moderate
 - Low

DRAFT

BRENTWOOD BOROUGH COUNCIL

Overall Contribution of Parcels to Green Belt Purposes

Drawn By: [Name] Checked By: [Name] Date: 09 Nov 2017 Scale: 1:25,000 Paper Size: A2

Issue: [Number] Final Review: [Name] Date: [Date] Drawing No: [Number] Figure 2

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