

**10 December 2014**

**Ordinary Council**

**Strategic Growth Options Consultation**

**Report of:** *Gordon Glenday, Head of Planning*

**Wards Affected:** *All*

**This report is:** *Public*

## **1. Executive Summary**

- 1.1 The National Planning Policy Framework (NPPF) requires local planning authorities to produce a Local Plan for their area. The most recent Brentwood Local Development Plan (LDP) consultation version was published in July 2013 (Draft Local Plan 2015-2030 Preferred Options).
- 1.2 Following consultation conclusion in late 2013/early 2014, it became apparent that several issues needed to be reconsidered, specifically Objectively assessed housing need; new employment land and job provision; Crossrail impacts; sustainability (renewable energy); planning for Gypsies & Travellers; and proposals made by Basildon Council.
- 1.3 In light of these, and to complement the Dunton Garden Suburb consultation prepared jointly with Basildon Council, a Strategic Growth Options consultation document has been prepared to provide an overview of the main issues to be considered as part of the Brentwood LDP, including spatial options and specific sites.
- 1.4 The consultation is proposed to take place for a period of six weeks, from 6 January until 17 February 2015.

## **2. Recommendation(s)**

- 2.1 To approve the Strategic Growth Options Consultation document. For publication and for a six week public consultation, subject to any non-material changes approved by the Acting Chief Executive and Chair of Planning and Development Committee prior to publication.**

### **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).
- 3.2 The most recent version of the Brentwood Local Development Plan (LDP) was the Draft Local Plan 2015-2030 Preferred Options for consultation (July 2013). Consultation on the Preferred Options took place between July and October 2013.
- 3.3 The Preferred Options document set out the long term vision for how the Council proposed the Borough should develop by 2030 and the draft strategy and policies for achieving that vision. It also identified preferred allocations for the provision of 3,500 new homes over the 15 year plan period. This was below the level necessary to meet the full objectively assessed housing need for the Borough over the same period (approx 5,400 new homes).
- 3.4 The proposal to provide for fewer new homes than the full need was based on the conclusions of various technical evidence. These set out that the Brentwood urban area and north of the Borough are either at capacity, or over capacity, in several key infrastructure provisions, specifically local roads and highways; primary school places and lack of adjoining land at existing schools to expand; GP facilities; and high landscape value. In addition, it was set out as important to consider that Green Belt covers 89% of the Borough, ranked 6<sup>th</sup> highest in England (most Green Belt within an authority's boundary expressed as a percentage). On that basis it was proposed that the Borough could accommodate 3,500 new homes, more than the now revoked East of England Plan (regional plan) required, but some 2,000 less than full objectively assessed need.

### **4. Issue, Options and Analysis of Options**

- 4.1 Following consultation conclusion in late 2013/early 2014 it became apparent that several issues needed to be reconsidered, specifically:
- **Objectively assessed housing need:**
    - Objections from three neighbouring authorities (Basildon Council, Chelmsford Council, and Thurrock Council) through the duty to cooperate on the basis that the Preferred Options document did not propose to meet all of the Borough's housing need, and that

those adjoining authorities would not accept any shortfall from Brentwood Borough within their own boundaries.

- Consequences of failure to meet full need became more clearly evident in decisions by Planning Inspectors to other Local Plan examinations; Plans that did not meet full need were found 'unsound' on the basis that they did not conform with the NPPF.
- The need to positively prepare the Plan supported by published technical evidence.

- **New employment land and job provision:** The need to correct errors in the employment land provision figures and review economic evidence in light of the related housing supply position, meant that this issue needed to be revisited to inform future Plan preparation.
- **Crossrail:** The need for additional evidence on the economic impacts arising from the arrival of Crossrail and other related impacts, was raised as an issue that required further consideration.
- **Sustainability:** Renewable energy evidence undertaken suggested proposed sustainability policies needed to be reviewed.
- **Planning for Gypsies & Travellers:** The Council set out in the Preferred Options document that a new Gypsy and Traveller Accommodation Assessment (GTAA) for all Essex authorities was awaited, and the conclusions once published could amend the proposed draft policy for provision of Gypsy and Traveller pitches.
- **Basildon Council proposals:** The Council became aware of proposals by Basildon Council through the duty to cooperate that the Basildon Draft Local Plan proposed a strategic development allocation at Dunton, up to the Brentwood Borough boundary.

- 4.2 The risk to the Council of continuing without reconsidering the above is that the Plan would be likely to be found 'unsound' at examination. As a result it is considered inappropriate to proceed to the Pre-Submission stage with the Preferred Options strategy. Consultation representations received to the 2013 Preferred Options are being considered and will be reported to Members soon as part of preparing the Draft LDP.
- 4.3 Required evidence has been commissioned and a Memorandum of Understanding between Brentwood and Basildon Councils was signed following approval by Planning & Development Committee on 4 November 2014. The MoU commits both Councils to prepare a joint consultation document to seek views on the concept of development to the east of West Horndon (in Brentwood Borough) and west of Laindon (in Basildon Borough), known as Dunton Garden Suburb.
- 4.4 Waiting for the outcome of the Dunton Garden Suburb consultation, considering the wide range of evidence, and issues relating to housing need and sites required to meet need means that the Council has the

opportunity to also consult on its own document to help inform LDP preparation. The Strategic Growth Options consultation document provides an overview of the main issues to be considered as part of the Plan and sets out all potential sites put forward to the Council for housing, employment and/or retail development, including those sites suggested during and after consultation in 2013.

- 4.5 The document further evolves the spatial options for where development could be located by identifying three broad locations for growth; the A127 Corridor, A12 Corridor and North of the Borough. This continues the focus on transport corridors as the most sustainable areas, in line with previous Plan consultations and Sustainability Appraisals.
- 4.6 The consultation provides the opportunity for stakeholders and the public to submit their views on these main issues which can then be taken into consideration when developing the Draft Local Plan. Following the consultation, all of the responses will be analysed and inform the production of the next iteration of the plan, the Draft Plan.

## **5. Reasons for Recommendation**

- 5.1 It is deemed necessary to undertake public consultation in order to thoroughly consider the views of statutory consultees and members of the public on future development options within the Borough.
- 5.2 There is a risk that without carrying out this consultation and going straight to the Draft Local Plan stage the Council would not have provided the appropriate opportunity for statutory consultees and members of the public to raise their views and inform the direction of the plan. This in turn could increase the chances of being found 'unsound' at Examination in Public.

## **6. Consultation**

- 6.1 The recommendation for approval will allow for a six week public consultation asking for views on the strategic growth options. The consultation period will commence on Tuesday 6 January 2015 and finish on Tuesday 17 February 2015.
- 6.2 This consultation period is in line with the adopted Brentwood Statement of Community Involvement (SCI).

## **7. References to Corporate Plan**

- 7.1 The Strategic Growth Options consultation forms part of the preparation of the Brentwood Local Development Plan, a key priority in the Council's Corporate Plan as part of 'A Prosperous Borough'.
- 7.2 Consideration and appraisal of the Growth Options document through consultation will enable continued preparation of the Plan in order that it stands the best chance of being found 'sound' at Examination in Public.

## **8. Implications**

### **Financial Implications**

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- 8.1 The cost of carrying out the Strategic Growth Options consultation has been accounted for within the existing Planning Policy budget. It is estimated that total consultation costs should total no more than £10,000.

### **Legal Implications**

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- 8.2 This is a necessary statutory consultation within the statutory requirements and the Council's adopted Statement of Community Involvement. The only legal aspect to be noted in the supporting papers is that the Government Consultation on Planning and Travellers closed on 23 November 2014 and the evidence base on need may need to take account of emerging or published changes to Government policy and guidance intended to ensure fairness in the planning system and strengthen protection of sensitive areas and Green Belt.

### **Other Implications**

- 8.3 The Strategic Growth Options document should be considered alongside the joint Brentwood and Basildon Council's Dunton Garden Suburb consultation document in terms of informing future Plan preparation.
- 8.4 As a result of this consultation, and to update the Local Development Plan timetable in light of changes since 2013, it will be necessary to update the Council's Local Development Scheme (LDS). The Growth Options consultation forms part of LDP preparation in line with Regulation 18 of

the Town and Country Planning (Local Planning) (England) Regulations 2012.

**9. Background Papers**

9.1 Brentwood Borough Local Plan 2015-2030 Preferred Options Consultation (July 2013).

**10. Appendices to this report**

- Appendix A – Strategic Growth Options Consultation document (to follow)

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