



**BRENTWOOD
BOROUGH COUNCIL**

The Rt Hon Sajid Javid MP
Secretary of State for Communities and
Local Government
House of Commons
London
SW1A 0AA

21st November 2017

BY EMAIL

Dear Sajid

Delivery of Brentwood Borough Council Local Development Plan

In response to your letter concerning the above and dated 16 November 2017, I write to clarify the position regarding details of the challenges faced, the progress that has been made to date, ongoing Duty to Co-operate, activity and a formal timeline for completion of the Local Development Plan in Brentwood.

I would begin by confirming that Brentwood Borough Council remains committed to producing a Local Development Plan, which meets the housing needs of the area and continues to work towards submission of the Plan, next year. The challenges faced in delivering this are significant for an authority like Brentwood.

Challenges

1. Green Belt

We welcome the Government's approach to the protected status of the Green Belt. We also support efforts to solve the national housing crisis. However, for a borough like Brentwood, where 89% of land lies within London's Metropolitan Green Belt, reconciling these two themes is particularly challenging.

Developing all available brownfield sites and taking into account already uncompleted permitted development, only meets half of our overall housing needs. This means that the Council has to make difficult decisions about the role of Green Belt and areas suitable to develop. With our neighbouring authorities in similar positions, this highlights the difficulties accommodating such high housing needs.

Notwithstanding this challenge, the Council recognises the expectation that Brentwood will meet its OAN and has been working hard to deliver this. We are developing a plan that meets the assessed increased number from June 2017 and we are creating a narrative around maintaining our existing local character whilst releasing part of the Green Belt to meet development needs. Our current proposals will still see 88% of the green belt protected.

2. Historic building rates

The number of new homes permitted by the Council but not yet completed has been increasing year on year and is now at the highest levels in several years. During this time, the levels of housing completions that the development industry has delivered has remained at similar levels; well below our development needs. This suggests a limitation in the ability to deliver the housing numbers that falls outside of land availability and local authority permissions. The Council is doing all it can to bring new homes forward and has set out a clear plan to deliver future housing needs in line with our local character.

3. Impact of repeated revision of OAN and question of calculation standardisation

In the past 10-years Brentwood's housing requirement has increased almost three times over, impacting on delivery of the Plan. At the same time, the borough's Green Belt coverage has remained the same, along with limited scope to increase local infrastructure capacity. This makes for a challenging environment in which to meet housing needs and other development requirements to ensure our local economy continues to thrive and that proper and sustainable communities, rather than just housing estates are delivered.

Progress to Date / Key Milestones

1. Sites identified for draft plan and Regulation 18 consultation carried out. (Feb 2016)
2. Successful submission of Dunton Hills Garden Village as an official Garden Village and inclusion in government scheme. (Summer 2016)
3. Following increase in OAN numbers, legal advice received to carry out further Regulation 18 consultation. (Summer 2017)
4. Approval to move to final Regulation 18 consultation. (November 2017)

Duty to Co-operate

In addition to ongoing dialogue at both member and officer level, I would also like to take this opportunity to outline the work we have been carrying out with five other South Essex councils to address the challenges common across the region, which exemplify the importance of the duty to co-operate requirements. Coming together with a vision for what South Essex should be in 2050, the Council has made a joint commitment to effective strategic planning across the area to deliver growth and new infrastructure. This includes potential to be a pilot for the Government's recently announced Statement of Common Ground. As we collectively face huge development needs and physical constraints that make these challenging to meet, we are working together to achieve infrastructure delivery and are thinking about the place, which goes beyond just the administrative boundaries. Brentwood Borough Council is committed to this as we support growth in South East Essex, defining this part of the county as a place to live, work and invest. The way that the Brentwood Local Plan needs to consider and relate to this work is vital and our officers are working hard to do so in the knowledge that a new plan is urgently needed for publication and in accordance with the timeline as follows:

Timeline for Submission

Jan 2018 - Final round of Reg 18 consultation commences;

March 2018 - Reg 18 consultation closes;

April / May / June - feedback considered and final plan proposals and supporting evidence, compiled;

Summer 2018 - Council set to approve Reg 19 consultation;

Oct 2018 - submission of LDP to Inspector.

The will of the Council is clear: to ensure that a plan, which meets our OAN (as of June 2017) is in place so that development is properly planned rather than the result of speculative applications. The thorough process by which we are collating evidence in a constantly changing context, and the specific set of physical circumstances Brentwood Borough finds itself in, provide answers as to why plan-making is taking time.

Brentwood is working hard to deliver what is required of the borough, in order to build much needed homes with job and business opportunities alongside. Our plans propose to meet our challenging development needs. We are doing so whilst fully taking into account proper process; understanding the level of objection to new homes that exists from local residents; and interest from the development industry about site locations with the threat of legal challenge.

Good progress has been made in delivering a strategy to meet development needs whilst retaining our unique local character, including delivery of a brand-new garden village. The Council has welcomed and been grateful for the support shown by your department under the garden villages programme, for which Brentwood Borough has one of only 14 designated garden settlements nationally; Dunton Hills Garden Village. This shows the progress we have made in devising our strategy to deliver a new settlement in keeping with our local village character. Work has been continuing to ensure that the garden village distinction actually means what it should in Brentwood and that this is not just another housing development. We are also working to identify ways in which housing delivery can be accelerated at Dunton Hills, along with an increased number of dwellings included for this site, supported by land for employment opportunities.

I understand the need for additional housing and employment opportunities and support the drive to deliver a plan. I welcome continued dialogue and co-operation with our partners, including DCLG as we move ahead to submission in 2018 whilst ensuring that we are preparing for developing Brentwood for deliverable and sustainable growth.

Yours sincerely



Louise McKinlay
Leader of Brentwood Borough Council