



**Brentwood Draft Local Plan – Preferred Site Allocations
Site Selection Methodology and Summary of Outcomes
Working Draft**

January 2018

1. Background and Introduction

- 1.1 Brentwood Borough Council is preparing a new Local Plan which will set out the long-term vision for how and where the Borough will develop over the next 15 years (to 2033).
- 1.2 The new Local Plan must allocate sufficient land in appropriate locations to meet housing, traveller and employment needs over the Plan period. As part of the evidence base for the emerging Local Plan, residential and employment sites have been assessed based on site selection methodology that provides a framework for the identification of appropriate sites for allocation. This report provides further details of the methodology developed and draft assessment results.

2. Brentwood Borough Council's Housing Needs

- 2.1 Based upon the best available evidence at the time, the Draft Local Plan (2016) set out an objectively assessed housing need for the borough of 362 dwellings per annum, for the lifetime of the plan (2013-2033), which equalled 7,240 dwellings in total. The Strategic Housing Market Assessment (SHMA Part 1) (2015) and a subsequent report on affordable housing provision (SHMA Part 2) underpinned the Draft Local Plan (2016) position.
- 2.2 Since the SHMA was drafted in late 2015, the Office for National Statistics (ONS) and Department for Communities and Local Government (DCLG) have released new data, which has been considered as part of assessing housing need as required by national policy and guidance. Using the minimum revised net dwelling baseline figure (280) plus combined market signal adjustment and contingency adjustment of 36% leaves an objectively assessed housing need of circa 380 dwellings per annum or 7,600 dwellings across the plan period (2013-33). The revised housing need from 362 per annum to 380 per annum across the plan period (20 years) equates to a total dwelling increase of 360 additional units.
- 2.3 The Department for Communities and Local Government has recently consulted on the methodology for a standardised approach to calculating local housing need in England. The Council responded to this consultation outlining concerns over the proposed methodology and datasets which would see an increase in Brentwood's housing need to 454 dwellings per annum. This would be an additional 74 dwellings per annum. Whilst the outcome of the consultation is not yet confirmed it is considered prudent to allocate numbers slightly above 380 dwellings per annum to create some degree of flexibility and contingency should some housing sites fail to come forward as expected.

Table 1.1 Housing land supply in Brentwood over plan period (2013-33)

Completions 2013/14 – 2016/17	527
Extant Planning Permissions (April 2017)	825
Forecast Forward – Additional completions and permissions (1 April 2017 – 31 March 2018)	250
Windfall allowance (2020/21 to 2032/33) (including non-implementation discount)	507
Remaining number of dwellings to be identified	5,491
Total	7,600

3. Overview of Site Selection Methodology

3.1 The Local Plan must allocate sufficient land in appropriate locations to ensure and supply for the plan period. This is reflected in paragraph 157 of the National Planning Policy Framework (NPPF), which states:

“Crucially, Local Plans should...allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate” and “identify land where development would be inappropriate, for instance because of its environmental or historic significance”

3.2 The portfolio of site allocations to be included in the Local Plan for housing must meet the policy requirement within paragraph 47 of the NPPF, by which local planning authorities should:

“identify...a supply of specific deliverable...sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land...” and “identify a supply of specific, developable...sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”.

3.3 The NPPF also specifically addresses “using a proportionate evidence base” advising local planning authorities (paragraph 158) to ensure “...that their assessment of an strategies for housing, employment and other land uses are integrated, and they take full account of market and other economic signals” and that the Local Plan must be justified as “...the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence” (see paragraph 182). This is a key test of soundness and is fundamental to the site selection process.

3.4 Finally, paragraph 152 of the NPPF includes the following overarching policy advice:

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate”.

It is therefore important that the process of site selection must adhere to these principles and

avoid significant social, environmental, or economic harm, within the context of other policies in the NPPF.

3.5 In response to the requirements of government policy and practice guidance contained within the NPPF and Planning Practice Guidance (PPG), the Council have developed a Site Selection Methodology. The methodology provides an overview on how suitable housing and employment sites have been identified. A list of the most appropriate residential and employment have been selected and included as proposed site allocations in the Brentwood Draft Local Plan – Preferred Site Allocations, which will be subject to a six week formal consultation from 29 January to 12 March 2018.

3.6 The overall site selection methodology can be summarised in six stages and is set out in Figure 1 below. Through each of the stages sites are sieved and subject to more detailed assessment at each stage. This allows for the identification of the proposed site allocations for residential and employment uses in the Draft Local Plan consultation.



FIGURE 7: Site Assessment Process

3.7 The remainder of this section explains how the site assessment methodology has been applied and provides a summary of the results. The assessment of employment sites is documented separately in paragraphs 3.39 and 3.40. Please note that the Sustainability Appraisal (Stage 3) is set out separately in the Interim SA Report that accompanies the Draft Local Plan – Preferred Site Allocations.

Stage 1 – Housing and Economic Land Availability Assessment (HELAA)

3.8 An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment of land availability is an important step in the preparation of Local Plans. The National Planning Policy Framework identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for the use which is most appropriate.

3.9 The assessment forms a key component of the evidence base to underpin policies in development plans for housing and economic development, including supporting the delivery of land to meet identified need for these uses. The assessment enables planning proactively by choosing sites to forward in the Local Plan to meet objectively assessed needs.

3.10 Work is still ongoing with the production of the Brentwood HELAA with detailed results to be published later in 2018. In the interim, sites that were submitted in response to the HELAA call for sites May 2017 have been included in the site assessment process.

3.11 The Housing and Economic Land Availability Assessment forms stage 1 of the assessment methodology. Sites subject to this process were assessed against the following criteria to determine if they advanced to the next stage:

- Housing sites capable of delivering 5 or more dwellings and employment sites greater than 0.25ha. Sites below these thresholds were considered to constitute windfall development;
- Sites were filtered out where they were identified as a duplicate site, subject to extant planning permission or being promoted for non-housing or employment (B Class) uses;

3.12 In total some 391 were identified for consideration in stage 1. From this 108 were identified as not being suitable based on the above criteria and did not proceed any further to be assessed. This left 283 sites to advance to stage 2 for further assessment. A summary of the reasons for discounting these sites at this stage is presented in Table 3.1 below. Appendix 1 identifies for each site removed from the site selection process at this point the reason(s) why it was discounted.

Table 3.1 – Sites Discounted at Stage 1

Reasons for not assessing a site beyond stage 1 of the site selection process	Number of sites removed
Housing site not capable of delivering 5 or more dwellings	43
Employment site smaller than 0.25ha	0
Duplicate site	19
Extant planning permission	42
Promoted for non-housing or employment (B Class) uses	4
Total	108

Stage 2 – Local Plan Spatial Strategy

- 3.13 Stage 2 of the site selection methodology is guided by the spatial strategy set out in the Draft Local Plan. The spatial strategy focuses 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. This approach is in line with government guidance and best practice. The release of Green Belt land should only be considered after all sustainably located, suitable, available and deliverable brownfield sites have been allocated as allocations.
- 3.14 The focus of the spatial strategy is to protect and enhance local character while fostering sustainable communities by concentrating new development on land within the Borough’s transport corridors. Brentwood and Shenfield are the focus for development in the A12 corridor supported by strategic allocation in the A127 corridor, bringing forward new homes, businesses and employment opportunities. In addition, there is the need for limited level growth in the larger villages to enhance the range and choice of local housing options but to also promote the retention and development of local services and community facilities.
- 3.15 With regards to employment sites 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.
- 3.16 The initial process for stage 2 was to identify those housing sites which are in unsustainable locations. This included sites in the Green Belt with no connecting boundary to an existing urban area (settlement hierarchy 1-3) or would involve an extension to a smaller village (settlement hierarchy 4). This excludes sites considered as strategic site options and employment sites.
- 3.17 Of the 283 sites that advanced from stage 1, 92 were identified as being in isolated locations or would constitute an extension to a smaller village. A summary of the sites is presented in Table 3.2 below. Appendix 2 provides further details on the sites identified at this stage.

Table 3.2 Summary of stage 2 sites – Isolated and connected to smaller villages

	Number of sites
Isolated sites within the Green Belt not connected to an existing urban area (settlement category 1-3)	76
Sites connected or within a smaller village (settlement hierarchy 4)	16
Total	92

3.18 With stage 2 identifying those sites which not going to fulfil the requirements of the spatial strategy at a high level. The more detailed analysis of sites is covered by stages 3-6, the guiding principles of this process will also be via the spatial strategy.

Stage 3 - Sustainability Appraisal

3.19 A key part of the evidence base is the Sustainability Appraisal (SA), which is a systematic process that must be carried out during the preparation of a Local Plan. 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. The SA allows for the consideration of opportunities to improve environmental, social and economic conditions in the local area and identify how to mitigate the impact of development. The SA is generally applied as an iterative learning process running parallel to the Plan as it progresses.

3.20 The interim SA 2018 which accompanies the Draft Local Plan – Preferred site allocations consultation carries out an assessment of all sites against various sustainability criteria. For completeness all suggested sites are assessed in the SA. As mentioned above the SA is an iterative process and there is a feedback process involved throughout the rest of the assessment process i.e. stages 4-6. Table 3.3 below sets out the criteria sites have been assessed against in the SA.

3.21 In addition to the Sustainability Appraisal the Habitats Regulations Assessment is another key part of the evidence base. The objective of the assessment is to identify any aspects of the Plan that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites) and including potential SPAs, possible SACs and Potential Ramsar site, either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.

Table 3.3 SA Site Appraisal Criteria

Topic	Relevant Criteria
Air quality	<ul style="list-style-type: none"> • Air Quality Management Areas (AQMAs)
Biodiversity	<ul style="list-style-type: none"> • Site of Scientific Interest (SSSI) • Locally designated wildlife sites • Ancient semi natural woodland • Local Nature Reserves

	<ul style="list-style-type: none"> • Other woodland
Community and well being	<ul style="list-style-type: none"> • GP Surgery • Primary School • Secondary School
Cultural Heritage	<ul style="list-style-type: none"> • Conservation area • Registered park or garden • Scheduled monument • Listed Building
Flooding	<ul style="list-style-type: none"> • Flood risk zone
Landscape	<ul style="list-style-type: none"> • Special Landscape Area (SLA) • Landscape Improvement Area • Green Belt
Soil and contamination	<ul style="list-style-type: none"> • High quality agricultural land

Stage 4 – Detailed Site Assessment

3.22 The assessment of sites comprises the consideration of several key criteria including flood risk, Green Belt, landscape and highways. In addition, the potential impact on historic assets ecological designations, utilities, education, health facilities also need to be considered. The deliverability of a site in light of major constraints and the availability of a site (i.e. has the site had active promotion) are also important. There is an importance associated with taking a qualitative approach when analysing sites using these criteria for example site visits are carried out to cross check desktop based assessments.

3.23 As detailed below sites have initially been considered based on the sequential approach as guided by the spatial strategy. Sites have then been selected based on initial high-level assessment of the key assessment criteria with conclusions for each site summarised in Appendices 3-6. This high-level assessment was carried out referring to emerging evidence, desktop assessment and relevant submitted site information. An element of planning judgement was then used to consider all the factors and decide whether a site is suitable for allocation. More detailed site assessment work will be produced later as emerging evidence is published.

Brownfield and Greenfield sites within settlement boundaries

3.24 In line with the spatial strategy land uses have been considered sequentially in line with guidance and best practice. If Green Belt land needs to be considered to help meet needs then this should only be after all suitable and available brownfield and greenfield land within settlement boundaries is identified first. On this basis all brownfield and greenfield land within the settlement boundaries has been identified. Table 3.4 below provides a summary of the sites and how many of these are suitable for allocation. Further details of the sites can be found in Appendix 3.

3.25 Following the high-level assessment of the brownfield and greenfield sites the majority of those discounted was based on there not being clear demonstration of availability. Whilst some might be suitable, without confidence of the site being able to come forward they cannot be relied upon as an allocation. Some of these may still come forward in future as windfall sites.

Table 3.4 – Brownfield and Greenfield sites within settlement boundaries

Brownfield and Greenfield sites within settlement boundaries	Total number of sites	Preferred Allocations	Preferred Allocations - Estimated dwelling yield
Brownfield sites within Brentwood urban area	30	11	1,152
Greenfield sites within Brentwood urban area	6	2	95
Brownfield sites within settlement boundary – Other locations	5	3	580
Total	41	16	1,827

3.26 From the 16 brownfield and greenfield sites within settlement boundaries identified as being suitable for allocation these provide an estimated dwelling yield of 1,827. This therefore does not meet the overall housing need for the Borough and further sites were required to be identified within the Green Belt.

Green Belt sites edge of urban area

3.27 Table 3.5 below provides a summary of the Green Belt sites that were considered and of those how many were identified as preferred allocations. Further details on these sites can be found in Appendices 4-6.

3.28 This has followed a sequential approach by identifying suitable sites adjoining the Brentwood urban area first, followed by the village service centre in Ingatstone and then the edge of larger villages. This is in line with the spatial strategy to enable a focus of development in the transport corridors supported by sustainable growth in the larger villages.

3.29 Decisions on suitable Green Belt releases have been based on being able to identify urban extensions within reach of services and infrastructure and with natural or man-made defensible boundaries such as rivers, roads, railway or historic hedge lines, to prevent further sprawl and meet needs swiftly. Green Belt has also been considered in strategic terms when deciding on where it is sensible to release land around existing settlements.

Table 3.5 – Green Belt sites edge of urban areas

Green Belt sites edge of urban area	Total number of sites	Preferred Allocations	Preferred Allocations – Estimated dwelling yield
Edge of Brentwood urban area	54	13	1,440
Edge of Ingatstone	9	3	218
Edge of larger villages	42	6	169
Total	105	22	1,827

3.30 The 22 Green Belt sites on the edge of the urban area identified as being suitable for allocation provide an estimated dwelling yield of 1,827. Combined with the brownfield and greenfield sites in the urban area provides a total of 3,654 dwellings. This still leaves a shortfall in terms of meeting the Borough's Objectively Assessed Housing Need over the plan period. The suitability of identifying large scale strategic sites therefore required assessment.

Strategic Sites

3.31 In addition to identifying suitable Green Belt urban extensions the opportunity to achieve a sustainable strategic release of land has been recognised in the spatial strategy. On this basis three strategic sites were identified which included Brentwood North, West Horndon and Dunton Hills Garden Village. Further details of the sites comprising these options is set out within Appendix 7. Each of these strategic options provides an opportunity to create large scale comprehensive developments that could support the provision of significant infrastructure improvements. The appraisal of the strategic options is covered in the Sustainability Appraisal.

Employment sites

3.32 The approach to the selection of employment sites has required the 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.

3.33 As well as site specific considerations sites have been selected with a focus upon the A12 and A127 growth corridors and commercial considerations such as access to major transport corridors (important for logistics) and to a certain degree visibility / ease of access for attracting workers and business branding. A summary of the assessment results can be found in Appendix 8.

3.34 Whilst primarily there is a need to ensure new employment land is identified to meet forecasted future requirements, there are a number of qualitative factors that have been considered. These qualitative factors can include:

- The locational needs of different occupiers and employment spaces;
- Gaps in supply of particular land uses;
- The quality of premises and land to attract more occupiers; and
- Improving and modernising existing premises to meet new business needs.

Based upon Planning Practice Guidance market signals and intelligence has been taken into account to analyse the needs of particular sectors. This helps ensure that new land supply is situated in appropriate locations for occupiers and businesses of different types. Further details on employment land supply can be found in the Economic Futures Report 2013-2033 published in January 2018.

Housing and Employment Trajectories

- 3.35 Further work will be carried out on calculating the potential delivery trajectories of all housing and employment suggested sites. This will demonstrate what the theoretical number of dwellings and employment space could be delivered over the plan period.

Stage 5 – Whole Plan Viability Testing

- 3.36 The purpose of Whole Plan Viability testing is to appraise the viability of Brentwood Borough Council's Local Plan in terms of the impact of its policies on the economic viability of the development expected to be delivered during the Plan period. The study will need to consider policies that might affect the cost and value of development (e.g. Affordable Housing and Design and Construction Standards) in addition to the potential to accommodate Community Infrastructure Levy Charges.

- 3.37 Section 173 of the National Planning Policy Framework requires that plans should be deliverable ensuring that obligations and policy burdens do not threaten the viability of the developments identified in the plan. An assessment of the costs and values of each category of development is therefore required to consider whether they will yield competitive returns to a willing land owner and willing developer thus enabling the identified development to proceed.

- 3.38 The study will also include an assessment of the ability of different categories of development within the Local Plan area to make infrastructure contributions via a Community Infrastructure Levy (having taken account of the cost impacts of Affordable Housing delivery and other relevant policies). If there is any additional return beyond these reasonable allowances, then this will be the margin available to make CIL contributions.

- 3.39 The most recent whole plan and CIL viability assessment was published in May 2016. This concluded that there was a good level of viability for both residential and commercial developments in the Borough based on the Draft Local Plan 2016 policies. It is intended that this work will be updated prior to the submission of the Plan to ensure viability is properly tested.

Stage 6 – Local Plan Submission Version

- 3.40 Prior to the Local Plan Submission version being published further detailed work will need to be published on various aspects of the site assessment process building on what has been established so far. As outlined above there will be further updates to the HELAA, detailed sites assessment and viability assessment. The Sustainability Appraisal and Habitats Regulations Assessment will need to continue to be iterative alongside the production of the Local Plan and selection of sites.

General note on net developable land calculation

3.41 For all sites the net developable land area has been calculated. This is the area of land considered likely to be able to accommodate dwellings. It removes the area of land that is likely to include formal and informal open space, road infrastructure and landscaping. A standardised calculation was applied as follows:

Gross area of site (ha)	Net Developable area
0 – 0.4	100%
0.4 -2	90%
2-10	75%
10+	65%
100+	50%

3.42 Using the net developable area allowed for a more realistic dwelling figure when applying an assumed density that could be achieved on the site. In most instances where up to date information had been provided by the site promoter and appeared to be reasonable this would be used.