



**BRENTWOOD
BOROUGH COUNCIL**

Draft Local Plan

2013 - 2033

February 2016

COMMENT FORM

From 10 February to 23 March 2016 we are consulting on the Draft Local Plan for Brentwood Borough. You can view and comment on the Draft Local Plan online at www.brentwood.gov.uk/localplan

Alternatively, please use this form to share your views on the contents of the Draft Plan.

All responses should be received by Wednesday 23 March 2016

Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email them to planning.policy@brentwood.gov.uk

Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form you are agreeing to these conditions.

PERSONAL DETAILS

Title: **Mr**

First Name: **[REDACTED]**

Last Name: **[REDACTED]**

Address:

[REDACTED]

Post Code:

[REDACTED]

Telephone Number:

[REDACTED]

Email Address:

[REDACTED]

YOUR COMMENTS

Please indicate which section(s) of the Draft Local Plan you are commenting on (where applicable please clearly state the Policy reference or paragraph number):

Draft Local Plan for Brentwood (January 2016)

- Page 36 – Figure 5.5 – Identifies potential areas for *“the limited release of Green Belt through urban extensions near to local services and with defensible boundaries to prevent further sprawl and meet development needs swiftly”*
- Para. 5.24 *‘Settlement Category 1: Main Town – Brentwood Urban Area, made up of connected local centres such as Brentwood, Shenfield, Hutton Warley, Brook Street, and Pilgrims Hatch. Para. 5.27 – Urban extensions into the Green Belt are proposed in specific locations with clear physical defensible boundaries and accessible to local services and transport links. Release of land for development in these locations will enable a five year supply of housing to be achieved, boosting local housing needs swiftly in line with national policy and guidance.*
- Policy 9.12: Site Allocations in Green Belt
Sites allocated to meet housing needs in Green Belt will be expected to provide significant community benefit, both for surrounding existing communities and those moving into new homes on site. There will be a mix of housing on site to provide for a range of needs as indicated by evidence.

These sites will be de-allocated from Green Belt to allow development to take place and provide new defensible boundaries to protect open countryside for future generations.

The extent of development at Dunton Hills Garden Village will be de-allocated from Green Belt, to be set by a separate Masterplan for the garden village.
- Para. 6.7 confirms: *“the housing supply that is needed to ensure that the Council meets its objectively assessed housing need over the plan period 2013 – 2033 amounts to 7,240 dwellings. This equates to an average delivery rate of 362 dwellings per annum”* Para 6.9 states that *“development shall first be directed to suitable and accessible locations within existing settlements, conversion and reuse of previously developed (brownfield) land and buildings. Some of these locations will be previously allocated sites. However, due to the limited availability of these types of sites in the Borough, and to help maintain a five year supply of housing, some Green Belt land is proposed to be allocated for development during the Plan period”.*

Draft Local Plan Supporting Document: Site Allocations Maps (January 2016)

- New sites proposed.

Please specify if you Support, Object or are providing a General Comment:
(tick as appropriate)

Support

☐

Object

☐

General Comment

☒***New Sites Proposed***

Comments (please use additional sheet if required):

Introduction

This representation letter is submitted by Dalton Warner Davis LLP (DWD) on behalf of Mr Dhruv Patel and Mr Prashant Patel, the landowners of two Green Belt sites located on the northern edge of Pilgrims Hatch, Brentwood (see Appendix 1).

This consultation stage (Regulation 18 of the Town and Country Planning Regulations 2012) for the preparation of Brentwood Borough Council's draft Local Plan (January 2016) presents the opportunity of promoting additional land to be considered for Green Belt release for housing development to meet the needs of the Borough.

The Council's objectively assessed housing need over the plan period 2013-2033 is 7,240 dwellings (or 362 dwellings per annum). The most recent 'Five Year Deliverable Housing Supply Assessment' (June 2014) confirms that the Borough cannot demonstrate a five year deliverable supply of housing land (with 269 homes fewer than the calculated five year requirement). The Council states in its draft Local Plan that the release of Green Belt land for development is essential to enable a five year supply of housing to be achieved.

This letter provides an outline assessment of the sites with regard to the relevant assessment criteria used in Brentwood Borough Council's draft 'Assessment of Potential Housing Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation' (1 March 2016) which derives from Green Belt policy in the National Planning Policy Framework (NPPF) 2012.

Site Location and Context

Pilgrims Hatch is identified in the draft Local Plan (p.41) as one of the six connected local centres which make up the wider Brentwood Urban Area. The Pilgrims Hatch urban area, approximately 250-300 metres to the south of the sites, is excluded from the Green Belt. Both sites are within reach of existing services and infrastructure by way of their proximity with Pilgrims Hatch and are approximately 15 min walking distance from the town's main amenities (e.g. post office, shops). The Crow Green settlement is a ribbon development with bungalows/houses along Crow Green Road to the west of the sites and Days Lane to the north. To the west lies open agricultural land. Cottage Garden, Beads Hall Lane, is an existing Gypsy and Traveller site located to the south of Site 1, it is allocated in Brentwood's draft Gypsy and Travellers Site DPD (December 2009).

Site 1 (Appendix 2) is approximately 3.2 ha in size and comprises fields/agricultural land mostly bordered with hedgerows and vegetation, with a small ménage area for equestrian use in the eastern part of the site. The northern edge of the built up area of Pilgrims Hatch (defined by dwellings along Crow Green Lane and Hatch Road) is approximately 250m to the south of the site. There is an existing pond adjacent to but not within the south west of the site.

Site 2 (Appendix 3) is approximately 2.5ha in size and also comprise fields/agricultural land. The site is subdivided by a fence and has clear boundary defined by hedgerows and trees. Site 2 is approximately 300m the northern edge of Pilgrims Hatch.

There is an area of developed land directly to the east of Site 1 and to the south of Site 2 which contains a farm cottage and mobile home and barn which is accessed from Beads Hall Lane which connects with Hatch Road to the south. Site 1 takes access from the Hatch Road end of Beads Hall Lane and there is a separate access to Site 2 from the Days Lane end of Beads Hall Lane.

Planning policy context

Both Sites 1 and 2 currently fall within the Green Belt but are not subject to any landscape, environmental, open space, biodiversity or heritage designations. There are no known contamination issues on either site and the sites are not in an area identified as having potential for

flood risk.

Development on Green Belt land should be considered where the strategic priorities of the borough to accommodate new housing necessitates its release from Green Belt, accounting for all other planning, environmental and strategic considerations.

Planning history

Sites 1 and 2 do not have any recent or relevant planning history. The sites have not previously been put forward for consideration as part of Brentwood's Local Development Plan process. Site ref. G082 to the south east of Sites 1 and 2 entitled 'Greenacres Riding Stables & Land on the opposite, Beads Hall Lane' site (Appendix 4) was considered but discounted in the Strategic Housing Land Availability Assessment (SHLAA) (October 2011). The SHLAA states that Site G082 was *unachievable* due to access and contamination issues, and *unsuitable* as it was considered to be detached from the built up area and to constitute an unacceptable encroachment into the countryside.

Green Belt Urban Extensions

The NPPF states that '*The essential characteristics of Green Belts are their openness and their permanence*'. The NPPF states that the "Green Belt serves five purposes:

- *To check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The draft Local Plan requires that potential urban extensions into the Green Belt should have "*physical defensible boundaries and be accessible to local services and transport links*" (p.41).

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

The sites are located in close proximity (between 250-300 metres) to the northern edge of the Pilgrims Hatch local centre and therefore share a relationship with this existing built up area. The existing Crow Green ribbon development to the north and west of the sites could potentially act as a strong physical boundary to restrict any further development into Green Belt land beyond. Site 2 has a clearly defined 'soft' boundary bordered by hedges and tree lines which would go some way in restricting further sprawl.

Purpose 2: To prevent neighbouring towns merging into one another

The site forms the edge of an area of Green Belt in between Pilgrims Hatch and Crow Green. Although the site contributes to the sense of separation between these two settlements (particularly from an aerial view) it is less significant than the open expanse of land to the east of the site which separates Pilgrims Hatch from the larger urban town of Shenfield. Local topography, vegetation and dispersed settlement along Days Lane and Crow Green Road mean that the sites (particularly Site 1) are relatively well screened from the wider countryside.

Purpose 3: To assist in safeguarding the countryside from encroachment;

The site is part of a wider area of Green Belt which assists in safeguarding the countryside from encroachment from the surrounding developed areas (including Brentwood, Shenfield, Hutton, Warley, Brook Street, and Pilgrims Hatch). The majority of both sites are not in use and part of Site 1 contains horse paddocks and a ménage which performs limited countryside functions.

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

This function is not considered relevant to the site or the wider Green Belt in Brentwood as the towns within the borough do not have a historic character and no historic designations have been applied. The sites do not fall within a Conservation Area or a Historic Park or Garden which is the

primacy consideration as confirmed in the draft 'Assessment of Potential Housing Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation' (1 March 2016).

Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The function of Green Belt to assist in regeneration by encouraging the recycling of derelict and other urban land would normally be of relevance to the Borough as there continues to be a need (and is currently a national planning policy objective) to recycling derelict and other urban land in the Borough. However, the Council has indicated that it needs to identify additional land to support housing land supply and to consider Green Belt sites. At this point in time, therefore this function is not currently relevant as there is a need to identify new development sites over and above regeneration projects.

Conclusion and Recommendations

The sites are in close proximity (approx. 250-300 metres) from the established built up area of Pilgrims Hatch and are considered to bear a relationship with this local centre. The sites contribute to the general role of the Green Belt in the local area in performing the Green Belt functions of: restricting urban sprawl, safeguarding the countryside from encroachment. However, the sites are not widely visible and do not perform a key role in performing these functions.

There are existing physical and defensible boundaries created by the existing Pilgrims Hatch built up area to the south, the dwellings along Crow Green Road to the west and along Days Lane to the north of the sites, which would prevent further sprawl should these sites come forward for development.

Both Sites are available now and do not have any environmental or heritage policy constraints. The existing access to Site 1 from the Hatch Road end of Beads Hall Lane could be utilised in addition to the existing access to Site 2 from the Days Lane end of Beads Hall Lane.

Site 1 is 3.2ha in size and if a 'Green Belt density' of 30 dwellings (dw) per hectare (ha) were to be applied, the site could potentially accommodate around 96 dwellings. Site 2 is 2.5ha in size and applying the same density would result in around 75 units. Therefore if both sites were brought forward for low density housing development there would be a total contribution of 171 dwellings which equates to nearly 50% of Brentwood's annual target of 362 new dwellings per year.

It is proposed that both sites should be de-allocated from Green Belt to allow development to take place to meet the housing needs of the Borough and to protect open countryside for future generations.

Thank you for taking the time to respond. Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email to planning.policy@brentwood.gov.uk

APPENDIX 1: AERIAL PHOTOGRAPH OF SITES 1 AND 2



Crow Green Fishery

Carlton Carriages

B White Vehicle Services

Andrews and Bowhill Limited

Days Ln

Days Ln

Days Ln

Crow Green Rd

Crow Green Rd

Orchard Ln

Crow Green Ln

Christadelphian Hall

Beads Hall Ln

Hatch Rd

Doddinghurst Rd

Pro Stripe Bodyworks

APPENDIX 2: SITE 1 RED LINE PLAN

H.M. LAND REGISTRY		TITLE NUMBER EX384031	
ORDNANCE SURVEY PLAN REFERENCE	TQ5895 TQ5896		Scale 1/2500
COUNTY ESSEX	DISTRICT BRENTWOOD		© Crown copyright

The boundaries shown by dotted lines have been plotted from the transfer plan. The title plan may be updated from later survey information.



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APPENDIX 3: SITE 2 RED LINE PLAN

H.M. LAND REGISTRY		TITLE NUMBER	
ORDNANCE SURVEY PLAN REFERENCE		EX 267737	
COUNTY		SECTION	Scale
ESSEX			1/2500
DISTRICT		© Crown copyright	
BRENTWOOD			



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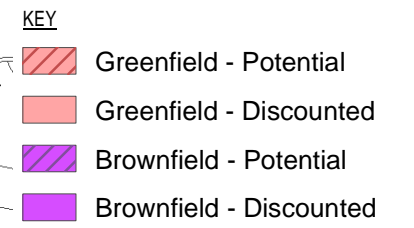
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APPENDIX 4: SHLAA 2011 PILGRIMS HATCH SITES



REVISIONS	Drawn By	Checked By	Date	
PURPOSE OF ISSUE	Rev.	Authorised for issue	Date	

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 **BRENTWOOD
BOROUGH COUNCIL**

PROJECT

DRAWING TITLE
SHLAA & UCS SITES

Scale:	DRAWN KA	CHECKED HT	CO-ORD CHECK HT
1:5,000	DATE 28/09/2011	DATE 28/09/2011	DATE 28/09/2011
		SHEET A3	PLOT DATE 28/09/2011

DRAWING NO
Pilgrims Hatch

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