



**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](http://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](mailto:planning.policy@brentwood.gov.uk)

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By submitting this form you are agreeing to these conditions.

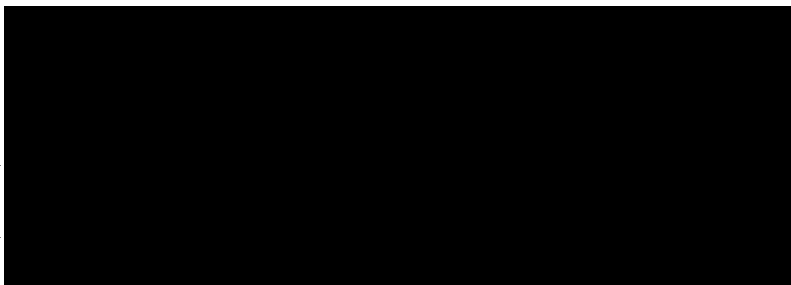
### PERSONAL DETAILS

Title:

First Name: **GL**

Last Name: **Hearn**

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Post Code:

Email Address:

## 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):

Comments on Draft Local Plan.  
Specific Policy References set out below.

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

Support	<input type="checkbox"/>
Object	<input type="checkbox"/>
General Comment	<input checked="" type="checkbox"/>

Comments (please use additional sheet if required):

### **THESE COMMENTS SHOULD BE READ IN CONJUNCTION WITH SUPPORTING REPRESENTATIONS REPORT**

#### **GENERAL COMMENT (01) ON DRAFT LOCAL PLAN**

These Representations set out the case for the site allocation of the site at Sawyers Hall Lane for housing development in the Local Plan. This is based on our assessment of site specific matters and Local Plan strategic matters.

- Site Specific matters relate to (1) addressing the planning reasons for non-allocation in the Draft LP, principally relating to: (i) Green Belt / clear physical defensible boundaries, (ii) highways impact, and (iii) accessibility, and (2) demonstrating deliverability of the site based on agreement with Hopefield Animal Sanctuary, soft-market testing and NPPF deliverability tests.
- Strategic matters relate to the fact that in order to make the Local Plan sound the housing target (based on OAN / SHMA) must be increased and the fact that the delivery of the identified supply of housing is questionable and the Council cannot demonstrate a five year housing land supply. As a result this creates the scenario that the Council must identify land for 2,000+ new homes to be delivered.

The proposals would also deliver a range of benefits to the local community, and most significantly would secure the long-term future of Hopefield Animal Sanctuary on-site.

Overall these Representations recommend that the site at Sawyers Hall Lane is identified as a Housing Land Allocation in the Local Plan, and that the site is released from the Green Belt.

The proposals at Sawyers Hall Lane would address key planning issues. They provide clear defensible boundaries to safeguard the countryside, do not lead to adverse impact on the local transport network and are the site represents a highly accessible and sustainable location.

The proposals are also able to deliver a range of social, economic and environmental benefits to Brentwood (as set out in Table 4) and would meet the Council's strategic objectives. Most significantly, the proposals are deliverable and would secure the long-term future of Hopefield Animal Sanctuary.

## **GENERAL COMMENT (02) ON DRAFT LOCAL PLAN**

These Representations are submitted to Brentwood Borough Council with the intention of assisting in the formulation of a sound Local Plan.

In conclusion, at present, the Draft Local Plan is considered to be not sound. Specifically it is:

- **not positively prepared** because the strategy for growth including the proposed housing target is not based on a national policy compliant calculation of objectively assessed needs. It must consider market signals, affordable housing needs and the impact of crossrail. The duty-to-cooperate with adjoining authorities is not evident and the Draft Plan does not provide a strategy to achieve the proposed housing target. To become sound, the proposed housing target must increase and additional land for housing must be allocated to deliver the strategy.
- **not justified** because the strategy is not appropriate and it cannot be delivered. To become sound, additional land for housing must be allocated to deliver the strategy.
- **not effective** because the plan is not deliverable. The identified source and supply of housing sites will not be delivered over the plan period and will not achieve the proposed housing target. In addition the Council cannot demonstrate a five year housing land supply, and there is a lack of evidence of joint-working with neighbouring authorities through the duty-to-cooperate. To become sound, additional deliverable and suitable sites for housing be identified to come forward in the first five years; and,
- **not consistent with national policy** because the proposed housing target has not been prepared in accordance with the NPPF or NPPG.

Overall it is recommended that the site at Sawyers Hall Lane should be identified as a Housing Land Allocation in the Local Plan. Significantly, bringing forward the site would help contribute towards addressing the key issues set out above in relation to soundness.

## **COMMENT ON GREEN BELT REVIEW**

These Representations recommend that the site at Sawyers Hall Lane is allocated for housing in the Local Plan. In particular the site achieves the requirements of Policy 5.1 and Policy 9.12 in relation to defensible boundaries.

It is also recommended to help justify the release from the Green Belt for development that the site is assessed as a single site in the Local Plan evidence base (not as two separate land parcels). Based on this assessment the overall contribution of the site to Green Belt purposes should be changed to be “low” or “low / moderate”.

## **COMMENT ON DELIVERABILITY OF SITE / HOPEFIELD ANIMAL SANCTUARY**

These Representations recommend that the site at Sawyers Hall Lane is brought forward within the first five years of the plan period. The site is able to secure the long-term future of Hopefield Animal Sanctuary (and this approach to the proposals has been agreed in principle with the existing occupier).

### ***Hopefield Animal Sanctuary Statement (October 2015)***

*Hopefield Animal Sanctuary currently occupy the Sawyers Hall Lane site on a lease with Tesco. Hopefield has had a number of open and honest meetings with Tesco, during which Tesco have expressed aspirations to promote the site for residential development and Hopefield have highlighted that they would like a more secure long term future.*

*A number of options for the site are being considered including Hopefield retaining a presence on a smaller portion of the site that would help enable a residential development on the remainder of the site. The principle of this would be acceptable to Hopefield if Tesco will help safeguard the legacy of the Sanctuary by allowing them to retain some essential activities on site as well as the existing access, buildings, stables and some grazing land. To make this sustainable for the Sanctuary, additional grazing land would be required off site that Tesco would provide as freehold to*

*Hopefield, the principle of which is agreed with Tesco.*

*These are the discussions we have been having with Tesco, and if an agreement can be reached along these lines we would support the proposed allocation.*

## **SPATIAL STRATEGY**

These Representations support the spatial strategy in general. It is recommended that the site at Sawyers Hall Lane is identified as a location to be released from the Green Belt and is allocated for housing development. This is based upon the fact that the site demonstrates characteristics which are necessary to justify Green Belt release for housing including being able to deliver new communities with clear defensible physical boundaries.

It is also recommended that due to Crossrail, strategic infrastructure investment, that deliverable and suitable potential housing sites around Brentwood town are identified for development in the Local Plan e.g. Sawyers Hall Lane. The Draft Local Plan should be positively prepared to take account of these factors.

## **HOUSING NEEDS**

These Representations object to the housing target set out in Policy 5.2. The housing target should be increased. This is because the objectively assessed need "OAN" calculation fails to take account of market signals, affordable housing needs and the impact of crossrail.

It is also recommended that the Council works with its neighbours under the duty-to-cooperate to coordinate and fully understand local needs.

The Draft Local Plan should be positively prepared to take account of these factors. The housing target in Policy 5.2 is not fully justified, effective or consistent with national policy.

## **HOUSING SUPPLY**

These Representations object to the housing supply breakdown set out in Policy 5.2. It is recommended that the supply of sites is re-considered because the sites set out in Policy 5.2 are not deliverable over the plan period and therefore would not achieve the housing target. This means that assuming there is no change to the housing target, sites to deliver an additional 1,500 new dwellings must be identified.

It is therefore recommended that the site at Sawyers Hall Lane is added to the Greenfield Urban Extensions in Green Belt sites to help meet the housing target.

The Draft Local Plan should be positively prepared and the housing sites set out in Policy 5.2 must be effective.

These Representations recommend that sites for housing in addition to those already identified in the Local Plan must be identified to come forward in the first five years e.g. Sawyers Hall Lane. The Councils is only able to demonstrate 2.5 years housing land supply.

## **GREENFIELD GREEN BELT SITES**

These Representations object to Policy 7.4. It is recommended that Policy 7.4, and supporting Figure 7.2, is revised to include the site at Sawyers Hall Lane as a Housing Land Allocation.

These Representations support Policy 9.11, as this policy direction recognises latest Government announcements and

consultation of the NPPF which recognise the important role that brownfield sites will play towards accelerating housing delivery. Any brownfield opportunities in the Green Belt should be maximised.

Therefore it is recommended that the Council acknowledge the fact that the site at Sawyers Hall Lane is a part brownfield site in the Green Belt.

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](mailto:planning.policy@brentwood.gov.uk)**



**GL Hearn**

Part of Capita Real Estate

# Representations to Brentwood Draft Local Plan

**Tesco Stores Ltd**

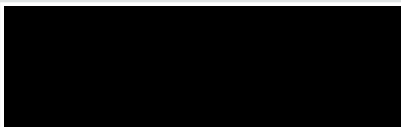
Land at Sawyers Hall Lane  
Brentwood  
Essex  
CM15 9BZ

March 2016

## **Prepared by**

GL Hearn

280 High Holborn  
London WC1V 7EE



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## Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

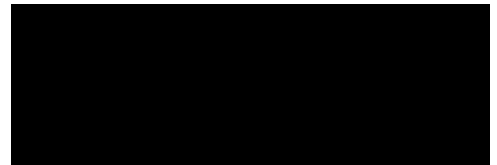
This document must only be treated as a draft unless it has been signed by the Originators and approved by a Business or Associate Director.

DATE  
23 March 2016

ORIGINATORS  
Roland Brass  
Associate Director



APPROVED  
Jennie Bean  
Director



### Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.



## 1 INTRODUCTION

- 1.1 These Representations are submitted to Brentwood Borough Council in response to the Draft Local Plan (2013 – 2033).
- 1.2 These Representations have been prepared and co-ordinated by GL Hearn, acting as Planning Consultants, on behalf of Tesco Stores Limited, who have a land interest at Sawyers Hall Lane, Brentwood “the site”. Supporting technical advice has also been provided by Waterman Infrastructure and Environment Ltd (transport and engineering), Bradley Murphy Design Ltd (landscape) and Saunders Architects (masterplan).
- 1.3 These Representations provide additional information to the representations submitted on 17 February 2015 “February Reps” in response to the Strategic Growth Options Consultation which identified “Sawyers Hall Farm, Sawyers Hall Lane / Doddinghurst Road, Brentwood” (Site Refs 024A and 024B) as a potential housing site in the A12 Corridor. It also provides additional information in respect of our presentation to Brentwood Members on 11 November 2015 and Further Reps submitted On 08 December 2015 “December Reps”.
- 1.4 These Representations set out the case for the site allocation of the site at Sawyers Hall Lane for housing development in the Local Plan. This is based on our assessment of site specific matters and Local Plan strategic matters.
- Site Specific matters relate to (1) addressing the planning reasons for non-allocation in the Draft LP, principally relating to: (i) Green Belt / clear physical defensible boundaries, (ii) highways impact, and (iii) accessibility, and (2) demonstrating deliverability of the site based on agreement with Hopefield Animal Sanctuary, soft-market testing and NPPF deliverability tests.
  - Strategic matters relate to the fact that in order to make the Local Plan sound the housing target (based on OAN / SHMA) must be increased and the fact that the delivery of the identified supply of housing is questionable and the Council cannot demonstrate a five year housing land supply. As a result this creates the scenario that the Council must identify land for 2,000+ new homes to be delivered.
- 1.5 The proposals would also deliver a range of benefits to the local community, and most significantly would secure the long-term future of Hopefield Animal Sanctuary on-site.
- 1.6 **Our recommended changes to the Draft Local are set out in bold underlined text. Overall these Representations recommend that the site at Sawyers Hall Lane is identified as a Housing Land Allocation in the Local Plan, and that the site is released from the Green Belt.**
- 1.7 Moving forward, and as part of the Local Plan making process, we welcome the opportunity to discuss matters further and engage in constructive and collaborative consultation with the Council and relevant stakeholders to help bring the site forward and deliver a range of community benefits.

1.8 This document is structured as follows:

- Section 2 – Response to Site Specific Reasons for Non-Allocation.
- Section 3 – Deliverability of the Site.
- Section 4 – Response to the Draft Local Plan.
- Section 5 – Proposals for the Site.
- Section 6 – Benefits of Development / Site Allocation.
- Section 7 – Conclusion and Next Steps.

## 2 RESPONSE TO SITE SPECIFIC REASONS FOR NON-ALLOCATION

2.1 This section provides information on the site and addresses the main planning reasons given by the Council for the non-allocation of the site at Sawyers Hall Lane in the Draft Local Plan. In particular it directly responds to matters relating to:

- i. The Green Belt – including the provision of new defensible boundaries to protect open countryside for future generations, development capacity and the Green Belt Assessment.
- ii. Highways – including the impact of the proposals on the transport network.
- iii. Accessibility – including the connectivity of the site to existing services and facilities.

### Site Description

2.2 The site at Sawyers Hall Lane is located within one of the two main growth corridors for development in Brentwood. It is relatively well-defined, and includes existing built development, and therefore it is in part brownfield site / previously development land in the Green Belt.

2.3 The site adjoins the north east of Brentwood town, and lies within the A12 Growth Corridor. It is 20 ha in size and forms an irregular rectangular shape. It is well defined to the north (by the A12), west (by the residential built-up edge of Brentwood town) and south (by existing playing fields). Existing trees and hedgerow form the eastern boundary of the site, separating the site from the wider landscape.

2.4 The site is used by Hopefield Animal Sanctuary and contains small to medium scale pasture fields and paddocks. It is part brownfield / Previously Developed Land<sup>1</sup> as it contains a number of buildings and hardstanding including visitor centre, stable and large vacant detached residential property. It is classified as Grade 3 agricultural land but is not used for farming. There are no TPOs on site.

2.5 Existing access is provided from Sawyers Hall Lane. There are no public footpaths crossing the site. Topography across the site rises gently from north east to south west. Beyond the site, land rises gently to the south west and more generally to the south and the urban area of Shenfield and Brentwood.

2.6 **These Representations recommend that the site at Sawyers Hall Lane is acknowledged as being part brownfield / PDL in the Local Plan.** A site location plan and redline is provided in **Figure 1** overleaf.

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<sup>1</sup> Previously developed land (NPPF definition): *Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.*

**Figure 1: Location Plan for Site at Sawyers Hall Lane**

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NOTES: Based on

**Legend**

-  024A Sawyers Hall Farm
-  024B Sawyers Hall Farm




Rev	Description	Date
-----	-------------	------

Purpose of Issue  
**FOR INFORMATION**

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Client  
**TESCO LTD.**

Project  
**SAWYERS FARM HALL, BRENTWOOD**

Drawing Title  
**FIGURE 1: SITE AND STUDY AREA**

Drawn SS	Checked LB	Approved LB	Date 12.02.2015
Job No. BMD.15.006	Scale NTS	Sheet Size A3	Revision -
Drawing Number BMD.15.006.DR001			

## The Green Belt and Clear Physical Defensible Boundaries

2.7 This sub-section demonstrates that the planning reason for non-allocation relating to the Green Belt / clear physical defensible boundaries has been fully addressed. It also considers the development capacity of the site (in landscape terms) and the Council's Green Belt Assessment.

### Clear Physical and Defensible Boundaries

2.8 The boundaries to the east and south of the site at Sawyers Hall Lane are considered to be less-well defined than those to the north and west.

2.9 In order to fully address this concern of the Council, the proposals (Figure 2: Landscape Masterplan below) have been significantly advanced to incorporate a new strong and long-term boundary on the southern and eastern edges of the site. This comprises the strengthening and gapping up of the existing hedgerow and the addition of further hedgerow trees to both boundaries, supplemented by a minimum 10m wide buffer (10 - 30m in width) of native woodland planting on the eastern boundary which extends west back in to the site to form a substantial woodland edge, augmenting the existing field boundary and in keeping with localised blocks of woodland within the local landscape context. An area of public open space in the south-east corner of the site with scattered native tree planting provides an opportunity for integrated attenuation and informal meadow to complement a proportion of development on the site. Highway infrastructure and built form associated with the development would be maintained a minimum distance of 30m from these boundaries.

2.10 These new edges serve to reduce the extent of development on site and they provide a clear linear and logical edge to the proposed development area which is more reflective of and in line with the existing edge of Brentwood town (to the south of the site).

2.11 Most significantly these proposals totally restrict the potential for development to spill over into the surrounding countryside / Green Belt. Therefore the existing countryside and role and function of the Green Belt is safeguarded.

2.12 Also, although the site is part of a much larger green wedge south of the A12, which separates areas of Brentwood and Shenfield. The proposals allow for incorporation of a considerable proportion of green infrastructure, along with retention and strengthening of existing field boundaries. These measures would complement the existing landscape character in this part of the Green Belt, and would constrain any visual connectivity between Brentwood and the adjacent settlement of Shenfield. The green infrastructure proposed would also provide public access to a currently inaccessible part of the green belt and significantly enhance ecological habitat and connectivity.

- 2.13 The proposals, including new strengthened boundaries as illustrated, would have a limited impact on the landscape and visual receptors, whilst ensuring the Green Belt was able to continue to fulfil its function under the NPPF.
- 2.14 Figure 2 below shows updated proposals to significantly strengthen the east boundary to create a clear physical and defensible edge.

**Figure 2: Landscape Masterplan for site at Sawyers Hall Lane**



This drawing is the property of Bradley Murphy Design Ltd. Copyright is reserved by them and the drawing is issued on the condition that it is not copied, reproduced, retained nor disclosed to any unauthorized person either wholly or in part without the consent of Bradley Murphy Design Ltd.

NOTES: Based on

**Legend**

- Development Site Boundary
- ← Filtered views into the site
- ↖ Clear Views
- Green space
- Development Parcels
- Proposed development fronting onto landscape
- Existing water course
- Existing Scrub
- Existing Tree
- Woodland Planting
- Proposed Trees
- Public Right of Way

Views available into site from the A12, consider retaining open area to watercourse as a visual and ecological buffer.

Built form should be set back from watercourse.

Built form should face boundary, suitable offset from treeline to be maintained.

Existing eastern boundary vegetation infilled and enhanced.

30m woodland buffer introduced, offset from site boundary.

POTENTIAL LINK TO MERRYMEADE PARK

Built form should face out on to watercourse and treeline.

Existing southern hedgerow infilled and supplemented with new hedgerow and tree planting.

Hopefield Animal Sanctuary to be retained

Rev	Description	Date
A	Update of masterplan	22.03.16

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Client  
**TESCO LTD.**

Project  
**SAWYERS FARM LANE, BRENTWOOD**

**OPPORTUNITIES AND CONSTRAINTS**

Drawn SS	Checked LB	Approved LB	Date 16.02.2015
Job No. BMD.15.006	Scale NTS	Sheet Size A3	Revision -
Drawing Number BMD_15_006_DR005			

## Development Capacity

2.15 In considering the development capacity of the site, Bradley Murphy Design conclude overall that the site has a moderate capacity to accommodate change to residential development as a result of the following findings:

- There are no landscape designations covering the site;
- The overall landscape sensitivity of the site is considered to be low;
- The site is visually well contained by mature vegetated boundaries and has no visual prominence within the wider landscape
- Intervisibility between the site and surrounding PROW and neighbouring land is low due to the presence of mature, tree lined field edges and intervening vegetation.

2.16 These conclusions are based on the following landscape character and visual assessment findings.

2.17 In terms of the landscape character:

- There are no landscape designations covering the site;
- The location of the site relative to the northern edge of Brentwood and the A12 has an urbanising effect on its overall tranquillity and perceived rurality;
- The site has some landscape qualities, namely mature vegetated boundaries, although vegetation within the Site itself is more sporadic leaving more open areas of pasture;
- The land use is agricultural with some derelict built form and low level farm buildings occupying the south west of the Site, the remainder of the Site is given over to pasture;
- The location means that at present the site partially contributes towards the visual and physical separation to the A12 from both Merrymeade Country Park and the urban edge of Brentwood. The overall landscape sensitivity of the site is considered to be low; and
- The surrounding area has a variety of uses; Merrymeade Country Park to the south and east of the site forms an important source of informal recreation in the immediate vicinity and combines with Hall Wood to offer a high quality landscape resource that present key features identified within the Doddinghurst Wooded Farmland LCA. Playing fields to the southwest of the site, the A12 on the northern boundary and the wider Brentwood Centre to the north of the A12 all contribute urbanising elements to the wider area, reducing tranquillity between the A12 and Merrymeade Country Park.

2.18 In terms of the visual assessment:

- The site is visually well contained. Mature tree and hedge boundaries to the east combine with intervening vegetation and open fields to screen longer distance views into the site from PROW in the east, allowing a visual separation with the Site to be maintained;
- Available views to the site from the north and east of the A12 are screened by taller coniferous and deciduous tree cover associated with the dual carriageway, although views of gently rising landform are glimpsed beyond the road corridor during winter;
- Where views are available when travelling on the A12 and from within the layby (adjacent to the north-east edge of the Site), both intermittent boundary vegetation and internal boundary vegetation is visible, filtering longer views into the main body of the site;
- To the west, dwellings on Rushdene Road have direct views into the site from upper storey windows; at present the existing buildings / stables and hardstanding within the south-west corner of the Site are visible features within views; and

- To the south the presence of school buildings screen views from the south west, with associated playing fields contributing to physical separation. Walkers within Merrymeade Country Park experience glimpsed views of the site beyond intervening vegetation, which defines the playing field boundaries. Visual receptors considered to be of medium to high sensitivity include walkers on the PROW to the east of the site, residents on Rushdene Road and walkers enjoying Merrymeade Country Park. Children using playing fields to the south and passengers of cars driving south on the A12 will also have a sensitivity to change, although due to the nature of the receptor, these are considered to be of low sensitivity.

### Green Belt Assessment

- 2.19 Furthermore, to respond to key issues in relation to the Green Belt, the Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation “Green Belt Assessment” (Crestwood Environmental Ltd, March 2016) has been reviewed.
- 2.20 Most significantly, in respect of the site at Sawyers Hall Lane, the site is assessed as two separate parcels (024a and 024b). These two parcels were set out in the Growth Options Consultation (2015) however in reality they form a single site. These Representations object to this approach especially as since the start of 2015 the site has been promoted to the Council as a single parcel. The results of the two parcel assessment are therefore inaccurate and do not fully reflect its true contribution towards the Green Belt purposes.
- 2.21 In terms of the overall contribution of the site towards the Green Belt purposes, the assessment of the two parcels currently scores 024a as “low” and 024b as “moderate – high”. These Representations recommend that the score for the parcel 024b should be more accurately recorded as ‘moderate’. This recommendation is based on the following:
- The Green Belt Assessment acknowledges that it assumes the development of the whole of the site, whereas the proposals illustrate how only a proportion of the site would be developed.
  - New planting would augment the boundaries to strengthen the existing clear physical defensible boundary to limit the extent of development on site whilst protecting the surrounding Green Belt
- 2.22 Notably, a “moderate” score would be the same as other Brentwood Greenfield Green Belt sites allocated for development at Doddinghurst Road, Honeypot Lane and Nags Head Lane.
- 2.23 Further to this, the initial Green Belt Assessment (set out in the February 2015 Representations), based on best practice, concluded that the site makes a Limited or No contribution towards the NPPF purposes. Key findings are summarised below.

<b>1: To check the unrestricted sprawl of large built-up areas</b>	<b>LIMITED / NO</b>
In terms of national policy origins this purpose has been written in respect of restricting untidy and irregular development (sprawl) from London (large-built-up area). The site is located away from London and would achieve well-planned and carefully considered development. At the local level	

the site is well defined with strong boundaries to the north, west and south. Proposals seek to significantly strengthen the eastern boundary. This means that overall the site would restrict development from spilling over into the wider countryside / Green Belt.		
<b>2: To prevent neighbouring towns merging into one another</b>	<b>LIMITED / NO</b>	
The site is not located within a gap between separate settlements. The site lies between residential suburbs within the main urban area of Brentwood (as defined in the Brentwood Settlement Hierarchy). The proposals seek to maintain and protect the Green Wedge between Brentwood and Shenfield.		
<b>3: To assist in safeguarding countryside from encroachment</b>	<b>PARTIAL</b>	<b>LIMITED / NO</b>
The site exhibits a mixture of urban and countryside characteristics. It is currently used as an animal sanctuary and includes previously developed land. In addition, prominent urban influences include the A12, and urban edge and mix of uses to the west and south. The A12 also acts as a permanent physical boundary which means the site is not connected to the wider countryside / Green Belt to the north. The site is urban fringe in character.		
<b>4: To preserve setting and special character of historic towns</b>	<b>LIMITED / NO</b>	
The site does not contain or is located next to any historic features, and Brentwood is not identified as a historic town.		
<b>5: To assist in urban regeneration</b>	<b>LIMITED / NO</b>	
The Council acknowledge that there is limited available brownfield land in existing settlements and is considering development on Green Belt land. In addition the site is part brownfield / previously developed land.		

2.24 **These Representations recommend that the site at Sawyers Hall Lane is allocated for housing in the Local Plan. In particular the site achieves the requirements of Policy 5.1 and Policy 9.12 in relation to defensible boundaries.**

2.25 **It is also recommended to help justify the release from the Green Belt for development that the site is assessed as a single site in the Local Plan evidence base (not as two separate land parcels). Based on this assessment the overall contribution of the site to Green Belt purposes should be changed to be “low” or “low / moderate”**

## Highways Impact

- 2.26 This sub-section of the Representations demonstrates that the planning reason for non-allocation relating to highways impact has been fully addressed. The information below provides a summary of the Highways Technical Note (Waterman Infrastructure and Environment Ltd, March 2016).
- 2.27 The Highways Note considers latest information of traffic modelling which has been published to support the Draft Local Plan and calculates the highways impact of the proposals at the site at Sawyers Hall Lane to demonstrate that the proposals would have a minimal effect on the junction of A1023/A128 (Wilson's Corner) double mini-roundabout and would be unlikely to have an adverse effect on traffic capacity or safety.

### Traffic Modelling Assessment

- 2.28 The Council's traffic modelling considers the following options.
- Option 1: Dunton Hills Garden Village – 2500 dwellings.
  - Option 2: West Horndon Extension – 2500 dwellings.
  - Option 3: North of Brentwood – 1169 dwellings.
  - Option 4: Land east of Running Waters – 1000 dwellings.
- 2.29 A number of employment sites have also been considered within the options. Some are included within all options and others individually, as shown below:
- Land adjacent to Ingatestone By-pass – All options.
  - Land at Codham Hall – All options.
  - Childerditch Industrial Estate – All options.
  - Land east of A128, south of A127 – Option 1.
  - Land west of Thorndon Avenue, West Horndon – Option 2.
- 2.30 The Highways Note takes the extensive traffic modelling work and methodologies undertaken as part of the Draft Local Plan to demonstrate the traffic impact of the proposed 450 units at Sawyers Hall Lane, in addition to the above sites.
- 2.31 It has been decided that the estimated traffic created by the proposals at Sawyers Hall Lane will be additional to that considered within the modelling of each Local Plan option. A particular focus has been placed on the A1023/A128 (Wilson's Corner) double mini-roundabout in the town centre (Figure 1, Highways Technical Note), as this is known as a "pinch-point" for traffic passing through the town, with delays experienced by vehicles on a number of approaches during the peak hours. The outputs from the 'Junction 8' traffic modelling undertaken on behalf of the Council has been used as the basis of the assessment undertaken.

### **Proposed Trip Generation**

- 2.32 In order to establish the likely level of traffic to be generated by the proposals at Sawyers Hall Lane the TRICS data has been interrogated. This indicates that the site could generate 144 two way vehicle trips during the AM peak and 218 two way vehicle trips during the PM peak. These trips would be distributed onto the local highway network.

### **Wilson’s Corner Junction Modelling**

- 2.33 Based on this modelling work for the AM peak hour, the Shenfield Road approach is at theoretical capacity in Options 3 and 4, while Ingrave Road is at this threshold in Options 1, 2 and 4. The results indicate that adding the traffic from the proposed Hopefield development to the Local Plan option traffic has a negligible impact on the operation of the junction, with minimal or no difference in RFC values or queue lengths calculated.
- 2.34 During the PM peak hour, the Ingrave Road approach is at theoretical capacity in Options 1, 2, 3 and 4 while High Street is at this threshold in Option 3.
- 2.35 The results of the Waterman assessment indicate that adding the traffic from the site at Sawyers Hall Lane to the Local Plan option traffic has a negligible impact on the operation of the junction, with minimal or no difference in RFC values or queue lengths calculated.

### **Key Findings**

- 2.36 The assessments undertaken on behalf of the Council indicate that the Wilson’s Corner double mini-roundabout is not at theoretical capacity in the 2030 baseline scenario, however it does reach this threshold on certain approaches when the Local Plan traffic is added to the baseline flows.
- 2.37 The work undertaken on behalf of the Council which assesses the local highway network with the various Local Plan options has been used as the basis to test the A1023/A128 (Wilson’s Corner) double mini-roundabout in the town centre, as this is known as a “pinch-point” for traffic passing through the town, with delays experienced by vehicles on a number of approaches during the peak hours.
- 2.38 The results of the traffic modelling, which includes the Local Plan options as well as the proposed traffic associated with the proposals at Sawyers Hall Lane for 450 units, indicates that the proposals have a minimal effect on the junction.
- 2.39 The Highways Note therefore demonstrates that the proposals at Sawyers Hall Lane for 450 units is unlikely to have an adverse effect on traffic capacity or safety.

## Accessibility to Local Service and Facilities

- 2.40 This sub-section of the Representations demonstrates that the planning reason for non-allocation relating to accessibility has been fully addressed.
- 2.41 Figure 3 overleaf shows walking distance from the site at Sawyers Hall Lane to local services and facilities. It clearly illustrates that the site is in close proximity to important supporting community infrastructure including schools, doctors' surgeries, convenience stores and the High Street (town centre) as well as bus stops and the railway station.
- 2.42 Significantly, the location of the site enables the proposals to generally meet guidance from The Institution of Highways & Transportation on "Providing for Journeys on Foot" which suggests that the acceptable walking distance to schools is 1,000m and for "elsewhere" preferred maximum distance is 1,000m.
- 2.43 In terms of national planning policy, the NPPF promotes accessibility as a core planning principle in Para. 17. It states that planning should "*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*". The site at Sawyers Hall Lane is considered to be such a sustainable site and therefore should be a focus for development.

## Education

- 2.44 Both primary and secondary schools are located within 800m walk of the site. Local schools include:
- St Helen's Catholic Infant School – 268 (264) roll (capacity).
  - St Helen's Catholic Junior School – 363 (369).
  - St Thomas of Canterbury C of E Aided Junior School – 310 (310).
  - Becket Keys C of E Secondary School – 282 (1,050).
  - Brentwood School (Secondary) – 1,477 (1,570).
- 2.45 The school roll and capacity figures (Source: DfE Website) suggest that there is limited capacity in primary schools, and some capacity in secondary schools. This analysis is reflective of what is set out in Para. 2.49 of the Draft Local Plan which states that "Primary schools in the Borough are generally at capacity, particularly within the Brentwood urban area, and some have limited physical space to expand. Secondary schools are generally performing with spare capacity". Therefore the issue of school capacity would impact upon all new development sites in Brentwood.
- 2.46 To support this The Draft Local Plan Pattern Book schools and capacity plan (page. 26) clearly shows that the site at Sawyers Hall Lane is with the catchment area of a number of schools.

### **Healthcare**

2.47 Health care services and facilities including GP services and Hospitals (Brentwood Community and Nuffield Health) are located close to the site. The following GP services are all within 800m and are all accepting new patients (Source: NHS):

- Brambles Branch Surgery, CM14 4FZ
- Dr M J Hunt, CM15 9DY
- Tile House Partnership, CM15 8AQ
- The New Surgery, CM15 8AB.

### **Other Community Infrastructure**

2.48 There are also a range of other community facilities in the vicinity of the site as set out below:

- Sport, Leisure and Open Space – Great Danes Youth Football Club, Brentwood Cricket Club Ground, Brentwood Sports Ground, Merrymeade Country Park, The Brentwood Centre and Bishop's Hall Park.
- Places of Worship – Doddinghurst Road Community Church
- Childcare – Faces Kids Club, Phoenix Day Nursery.

### **Public Transport**

2.49 The site is well connected to public transport with four bus stops within 400m and Brentwood railway station within 2.2km.

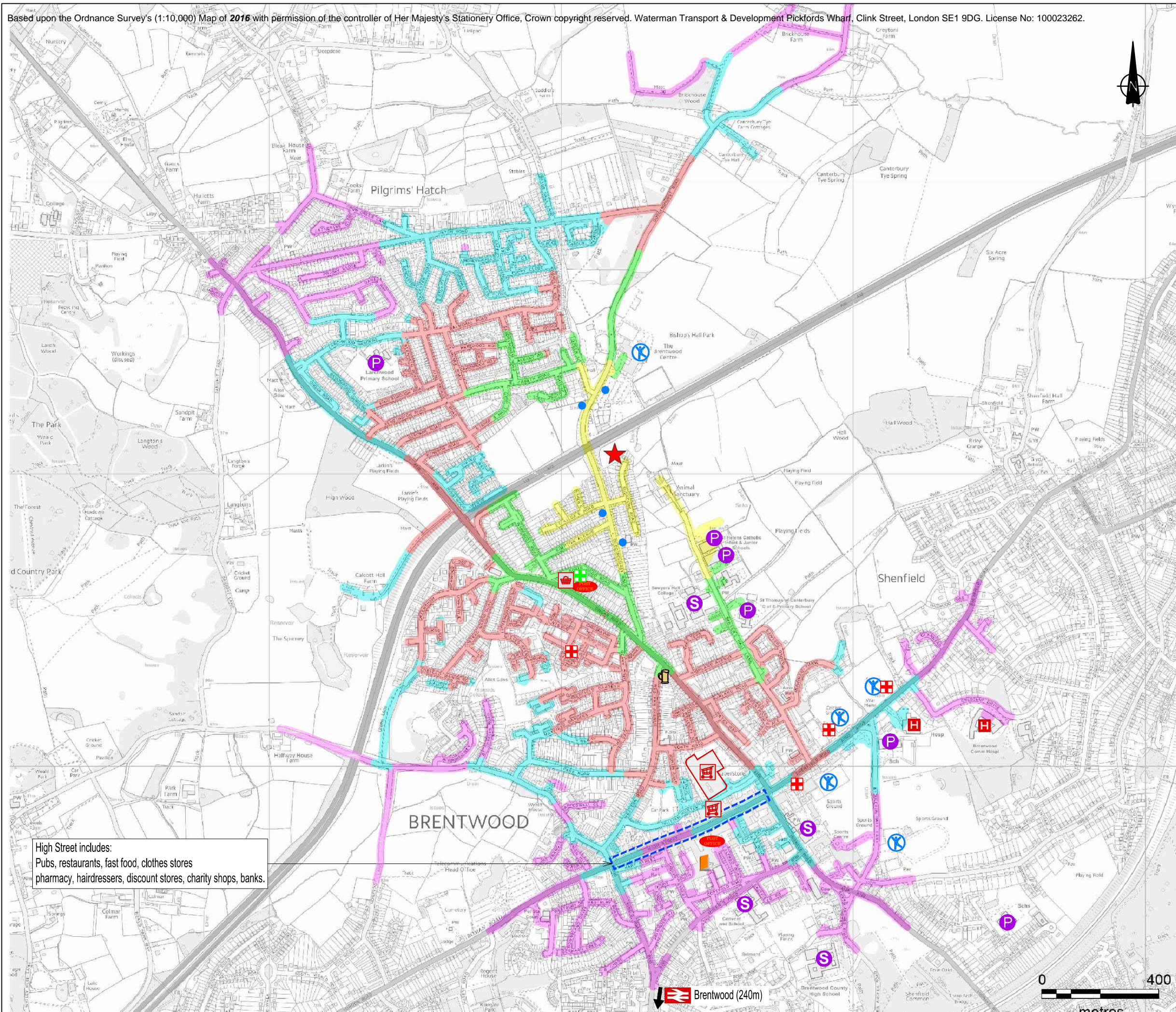
2.50 The nearest bus stops are situated within 250m of the site on Doddinghurst Road and are served by routes 73, 261 and 431. Additional bus stops are located within approximately 1.1km walking distance on Ongar Road and Brentwood High Street and are served by routes 71, 72, 73, 81, 251, 261, 351, 481, 498, 608, 808 and X81. These routes provide regular service to destinations including Chelmsford, Basildon, Southend, Romford and Lakeside Thurrock.

2.51 Brentwood Station provides a regular service to London Liverpool Street and Shenfield as well as destinations in between including Romford and Stratford on the TfL rail network with services every 10-20 minutes throughout the day in both directions 7 days a week. Notably, this station will be part of the Crossrail network with services expected to open in 2017. Other rail services also run to Chelmsford, Colchester and East Anglia.

















**Figure 3: Accessibility Plan**

Based upon the Ordnance Survey's (1:10,000) Map of 2016 with permission of the controller of Her Majesty's Stationery Office, Crown copyright reserved. Waterman Transport & Development Pickfords Wharf, Clink Street, London SE1 9DG. License No: 100023262.



High Street includes:  
Pubs, restaurants, fast food, clothes stores  
pharmacy, hairdressers, discount stores, charity shops, banks.

Key:

- 0 - 400m (0-5 min walk)
  - 400m - 800m (5-10 min walk)
  - 800m - 1200m (10-15 min walk)
  - 1200m - 1600m (15-20 min walk)
  - 1600m - 2000m (20-25 min walk)
- |  |  |
|--|--|
|  Site location    |  Convenience Store    |
|  Primary School   |  Post Office          |
|  Secondary School |  High Street Shopping |
|  College          |  Sports Facility      |
|  Library          |  Bus Stop             |
|  Hospital         |  Pharmacy             |
|  Supermarket      |  Doctors Surgery      |

Rev	Date	Description	By
A03	17.03.16	EDUCATION FACILITIES AMENDED	DM
A02	16.03.16	KEY AMENDED	AJ
A01	08.03.16	FIRST ISSUE	AJ

Amendments	
Project	Sawyers Hall Farm
Title	PEDESTRIAN CATCHMENT & FACILITIES
Client	Tesco



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**PRELIMINARY**

Designed by	Checked by	Project No		
Drawn by AJ	Date March 2016	CIV16973		
Scales @ A3 work to figured dimensions only 1:12,500		Computer File No CIV-16973-SA-95-0004-A03.dwg		
Publisher	Zone	Category	Number	Revision
CIV	SA	95	0004	A03

### 3 DELIVERABILITY OF THE SITE / SECURING THE FUTURE OF HOPEFIELD

3.1 This section provides information on joint-working between the landowner and occupier and demonstrates that the site is deliverable within the first five years of the Local Plan period. The following matters are discussed:

- Working in partnership to secure the long-term future of Hopefield Animal Sanctuary.
- Soft-Market Testing and house builders.
- Land ownership.
- Deliverability Assessment.

3.2 **Based on the information set out in this section, these Representations recommend that the site at Sawyers Hall Lane is brought forward within the first five years of the plan period. The site is able to secure the long-term future of Hopefield Animal Sanctuary (and this approach to the proposals has been agreed in principle with the existing occupier).**

#### Securing the Long-term Future of Hopefield Animal Sanctuary

3.3 Securing the long-term future of Hopefield Animal Sanctuary is fundamental to the overall strategy to bring the site forward for residential development. Tesco is committed to working with Hopefield and has met with the Animal Sanctuary on a regular basis over the last 18 months. The aim of current discussions is to formalise an agreement to retain Hopefield on-site, with some grazing off-site. These proposals are necessary as the lease arrangement to Hopefield Animal Sanctuary to occupy the site expires in 2022. The statement below has been signed off by Hopefield to confirm that the occupier is in agreement with the principles set out in the indicative masterplan for the site.

#### ***Hopefield Animal Sanctuary Statement (October 2015)***

*Hopefield Animal Sanctuary currently occupy the Sawyers Hall Lane site on a lease with Tesco. Hopefield has had a number of open and honest meetings with Tesco, during which Tesco have expressed aspirations to promote the site for residential development and Hopefield have highlighted that they would like a more secure long term future.*

*A number of options for the site are being considered including Hopefield retaining a presence on a smaller portion of the site that would help enable a residential development on the remainder of the site. The principle of this would be acceptable to Hopefield if Tesco will help safeguard the legacy of the Sanctuary by allowing them to retain some essential activities on site as well as the existing access, buildings, stables and some grazing land. To make this sustainable for the Sanctuary, additional grazing land would be required off site that Tesco would provide as freehold to Hopefield, the principle of which is agreed with Tesco.*

*These are the discussions we have been having with Tesco, and if an agreement can be reached*

*along these lines we would support the proposed allocation.*

### Soft-Market Testing and house builders

- 3.4 In 2015, the GL Hearn Residential Agency Team undertook a soft market testing exercise to consider the feasibility of the proposals and work towards identifying a potential development partner / house builder. This exercise shows the commitment from the landowner (Tesco) to bring forward a scheme that is deliverable and responds to the market.
- 3.5 The exercise included a 'soft marketing' campaign to both Land Promoters and Regional / National House Builders to discuss the proposals and type of housing to meet market needs. Parties with competing land allocations have been ruled out of the soft marketing exercise.
- 3.6 In terms of feasibility of the layout and mix of proposals, general feedback suggested that the site should provide approximately 20% flats with the remainder of dwellings as 2, 3 and 4+ bed houses. These proposals were considered to respond to the current and projected market demand in the area.
- 3.7 To further demonstrate deliverability, Tesco (via its subsidiary Spenhill) has a strong track record in bringing forward and developing residential-led schemes in the South East, such as in Watham Forest, St Albans, Faversham and Orpington. Further details are provided below.
- Highams Park, Waltham Forest – The site was a former industrial estates in north east London, and a regeneration scheme has been brought forward by Tesco Stores / Spenhill. The consented development is mixed use scheme including over 300 new dwellings, new supermarket and retail units and employment space. New homes have been developed as a mix of apartments and town houses, and include affordable housing provision, to meet local market requirements. The site was granted planning permission in 2011, and the majority of the scheme (250 new homes) is now occupied. The proposals exhibit high quality design and sustainability standards and seek to draw upon local character and design influences so that the new development is well integrated into surroundings. Specifically, the design of buildings exhibit a strong link with the work of local artist William Morris. His pattern design is included as part of the development, for example on the food store, external entrances and balconies, and this adds an interesting and attractive aesthetic feature to the project.
  - Gabriel Square, St Albans – The site is currently under-construction and is a higher end residential scheme, for 80 new dwellings, comprising mix of town houses, apartments and maisonettes around central open space / courtyard amenity area.

### Land Ownership

- 3.8 The land ownership plan set out in **Figure 4** demonstrates that land in the ownership of Tesco, adjoins adopted highways land. This is beneficial to the delivery of the site as it enable two access points for the site, from Sawyers Hall Lane and Doddinghurst Road. This information is set out in the Title Plan, which can be provided to the Council upon request.

## Deliverability Assessment

- 3.9 This sub-section assesses the deliverability of the site at Sawyers Hall Lane in respect of the NPPF which advises that LPAs should “*identify and update annually a specific supply of specific deliverable Sites*” for housing for years 1-5 (Para. 47). “*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*” (Footnote 11). Therefore the key considerations relate to the availability of the site, suitability of the location, achievability of development and viability of the scheme.
- 3.10 Notably, the Brentwood Strategic Housing Land Availability Assessment “SHLAA” (2011) stated that in relation to housing development part of the site was “suitable” and “achievable”, and the whole site was “available”.
- 3.11 **Availability** – Tesco Stores Limited own Land at Sawyers Hall Lane and the Title Number is EX392779. The site is currently occupied by Hopefield Animal Sanctuary and the landowner supports the occupier on-site is set out in more detail. The site is available for development now.
- 3.12 **Achievability** – The site is a greenfield site, and no insurmountable / significant constraints to development have been identified in relation to highways / access, environmental designations, flooding / drainage, and utilities provision is expected to be possible. Notably, the Council has also previously identified the site as a potential option for residential development. In addition, soft-market testing demonstrates that the proposals would meet market requirements and are therefore achievable and deliverable.
- 3.13 **Suitability** – The site is suitable for housing development for a number of reasons. It is located in the A12 Growth Corridor and is part of Brentwood town, which is acknowledged in the Draft Local Plan as a focus for growth. The site location is sustainable and accessible to a range of local services and facilities as well as public transport. The site contains no natural environment, historic environment or landscape designations other than the Green Belt, and displays low landscape sensitivity and with capacity to accommodate change in terms of residential development. It would be well-integrated with Brentwood town, contribute towards social sustainability and deliver a range of benefits including securing the long-term future of Hopefield Animal Sanctuary. In terms of the Green Belt, the site makes a Limited or No contribution towards the NPPF purposes.

3.14 Table 3 of these Representations sets out a phasing programme which demonstrates that development is able to commence within the first five years at the site at Sawyers Hall Lane.

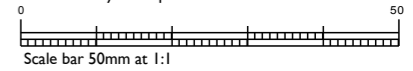
**Figure 4: Land Ownership Plan**



NOTES





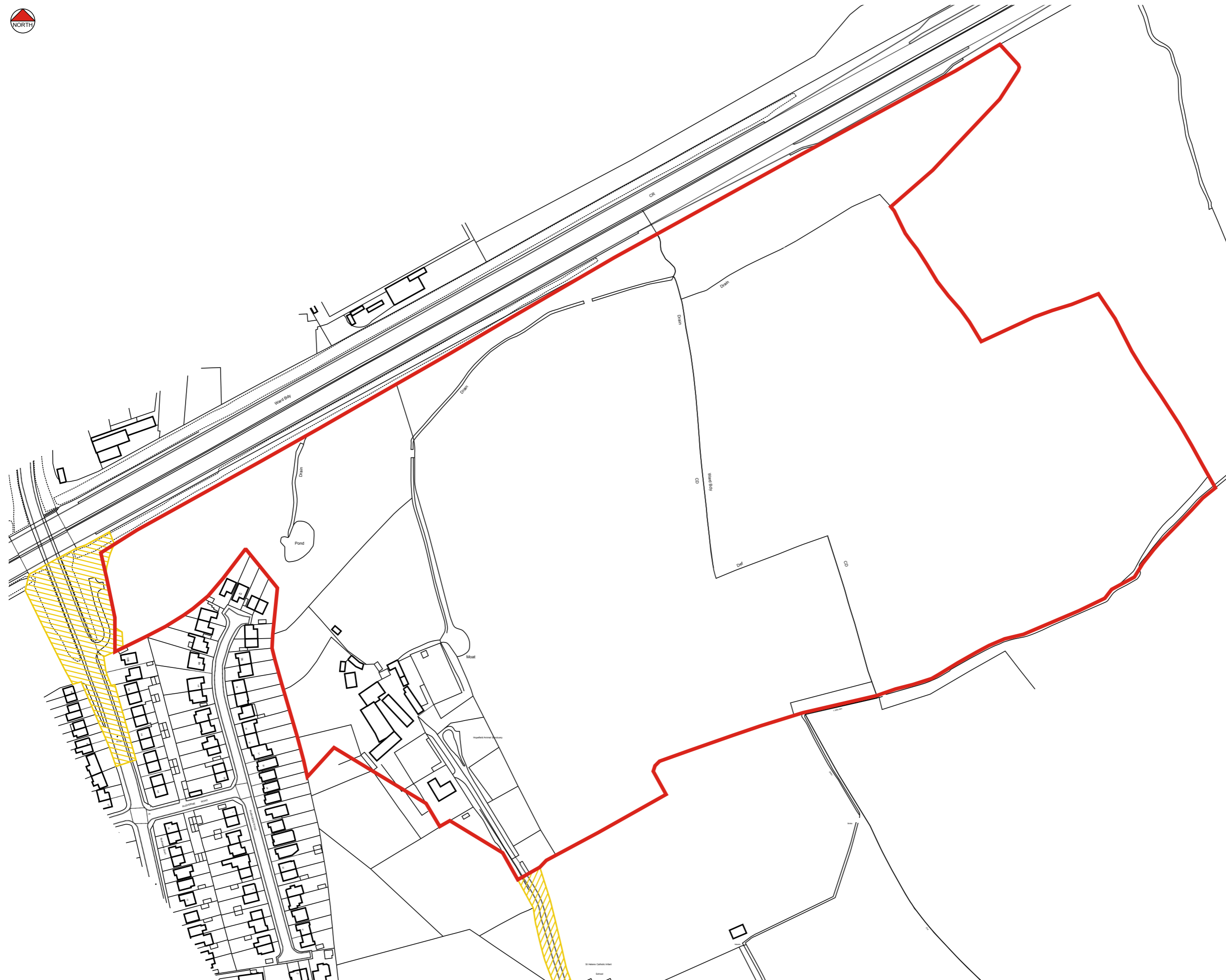
This drawing to be read in accordance with the specification/Bills of Quantities and related drawings. No Dimensions to be scaled from this drawing. All stated dimensions to be verified on site and the Architect notified of any discrepancies.



THIS DRAWING IS OUR INTERPRETATION OF INFORMATION PROVIDED BY OTHERS  
STOPPING UP ORDERS AND HIGHWAY ISSUES TO BE CONFIRMED BY THE HIGHWAY ENGINEERS BEFORE PROCEEDING TO CONTRACT  
EXTENT OF TITLE SITE BOUNDARY TO BE AGREED BETWEEN ALL PARTIES. LEGAL CONFIRMATION REQUIRED BEFORE PROCEEDING TO CONTRACT  
THIS DRAWING IS SUBJECT TO A FULL TOPOLOGICAL SURVEY AGREEMENT BETWEEN ALL PARTIES REGARDING THE SETTING OUT OF ARBITRARY BOUNDARIES AND IS BASED ON INFORMATION PROVIDED BY OTHERS  
PLEASE ALSO REFER TO SOLICITORS LEGAL REPORT REGARDING ANY RIGHTS OF WAY, RIGHTS OF LIGHT, EASEMENTS, COVENANTS AND LEGAL RESTRICTIONS.

**KEY**

-  SITE BOUNDARY
-  EXTENT OF ADOPTED HIGHWAYS



REV	DATE	NOTE	BY
A	09.06.15	AMENDED WITH ADDITION OF SAWYERS HALL LANE	KB

Project  
**PROPOSED RESIDENTIAL DEVELOPMENT  
SAWYERS HALL FARM  
BRENTWOOD**

Title  
**LAND OWNERSHIP PLAN**

Scale	Date
1:2500 @A3	MAY 2015
Drawn	Checked
KB	MB
Drawing Number	Revision
<b>7375/LP01</b>	<b>A</b>

Saunders Partnership Architects  
ARCHITECTURE | URBAN DESIGN | MASTER PLANNING

RIBA 





Weylyn Garden City | Bristol | Manchester | London



## 4 RESPONSE TO BRENTWOOD DRAFT LOCAL PLAN

4.1 This section responds to planning policies set out in the Draft Local Plan. It assesses the Draft Local Plan in light of national policy and guidance set out 2.1 in the NPPF (2012). These Representations consider that the Draft Local Plan fails to achieve the components of a sound plan as set out in the NPPF (Para. 182):

- **Positively prepared** – the Plan should be prepared based on a strategy which seeks to meet objectively assessed requirements – including unmet need from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with national policy** – the Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

4.2 The following components of the Draft Local Plan are discussed in this section:

- Policy 5.1: Spatial Strategy.
- Policy 5.2 Housing Growth.
- Policy 7.4 Housing and Land Allocations.
- Policy 9.11 Previously Developed Land in the Green Belt.
- Policy 9.12: Site Allocations.
- Policy 10.1: Sustainable Transport.
- Policy 10.9: Open Space, Community, Sport and Recreational Facilities.
- Policy 10.4: Design.
- Policy 10.5: Public Realm.
- 10.6: High Quality Design Principles.
- Policy 10.7: Infrastructure and Community Facilities.
- Policy 10.8: Open Space in New Development.
- Policy 10.13: Flood Risk.
- Policy 10.14: Sustainable Drainage.
- Figure 5.10 and at Appendix 3 of the Draft Local Plan provide information on the housing trajectory.
- Sustainability Appraisal (2016).
- Strategic Housing Market Assessment (2014).

## Spatial Strategy

- 4.3 **Policy 5.1: Spatial Strategy** states that: “*Brentwood and Shenfield will be the main focus for development in the A12 Corridor supported by two strategic allocations in the A127 Corridor, bringing forward new homes and jobs*”. The approach will help protect and enhance local character whilst fostering sustainable communities. To achieve this strategy the Draft Local Plan proposes limited release of Green Belt land for development in the transport corridors in strategic locations to deliver self-sustaining communities with local services, and with clear defensible physical boundaries.
- 4.4 **These Representations support the spatial strategy in general. It is recommended that the site at Sawyers Hall Lane is identified as a location to be released from the Green Belt and is allocated for housing development. This is based upon the fact that the site demonstrates characteristics which are necessary to justify Green Belt release for housing including being able to deliver new communities with clear defensible physical boundaries.**
- 4.5 **It is also recommended that due to Crossrail, strategic infrastructure investment, that deliverable and suitable potential housing sites around Brentwood town are identified for development in the Local Plan e.g. Sawyers Hall Lane.**
- 4.6 **The Draft Local Plan should be positively prepared to take account of these factors.**
- 4.7 In order to meet the requirements of Policy 5.1, Section 2 of these Representations clearly demonstrates that the site can provide new defensible boundaries. In addition, the site is located in the A12 Corridor and would form a sustainable extension to Brentwood town, which is recognised by the Draft Local Plan as a sustainable location for growth, with excellent transport links, access to jobs and services and town centre facilities (Draft Local Plan, Para. 5.19). Therefore, the site would support redevelopment and regeneration, underpin the viability of the town centre, and be accessible to services and jobs. It must also be noted that the effect of Crossrail enhances the sites credentials as an accessible location (see Figure 3 of these Representations) and suitable site for growth.
- 4.8 The **Hierarchy of Place** (Draft Local Plan, page. 41) reinforces this position as Brentwood Urban Area is identified as the “main town”, which is made up of “*connected centres*” such as Brentwood, Shenfield, Hutton, Warley, Brook Street, and Pilgrims Hatch (Para 5.24).
- 4.9 In relation to the spatial strategy, it is noted that the Sustainability Appraisal considered six reasonable alternative options for strategic development, including North of Brentwood. Notably, the site scored comparably against Dunton Hills Garden Village and West Horndon. Therefore, although no specific location is set out, it is considered that as a result, development to the North of

Brentwood e.g. non-strategic in nature at the site at Sawyers Hall Lane, represents a sustainable site.

## Housing Needs

- 4.10 **Policy 5.2 Housing Growth** sets the Borough housing target of 7,240 new residential dwellings over the plan period from 2013 to 2033. This equates to 362 dwellings per annum “dpa”.
- 4.11 **These Representations object to the housing target set out in Policy 5.2. The housing target should be increased. This is because the objectively assessed need “OAN” calculation fails to take account of market signals, affordable housing needs and the impact of crossrail.**
- 4.12 **It is also recommended that the Council works with its neighbours under the duty-to-cooperate to coordinate and fully understand local needs.**
- 4.13 **The Draft Local Plan should be positively prepared to take account of these factors. The housing target in Policy 5.2 is not fully justified, effective or consistent with national policy.**
- 4.1 Each of the three factors considered below (relating to market signals, affordable housing needs and the impact of Crossrail) is suggested to warrant further consideration in the preparation of the Local Plan, and points towards a higher objectively assessed need for housing than currently identified.
- 4.2 The NPPG<sup>2</sup> provides guidance on the process regarding how OAN for housing is expected to be assessed. Demographic projections are a ‘starting point’ but the assessed need should be adjusted where the evidence suggests that migration or household formation has been constrained; where it is necessary to support economic growth; to address market signals / improve affordability; or to enhance the delivery of affordable housing to meet the need identified.
- 4.3 The Council’s evidence base on OAN is spread across a number of studies<sup>3</sup> undertaken by different organisations. There is a lack of a clear narrative about how the various components of the evidence have been brought together to derive OAN for 362 dwellings per annum (dpa) identified in the Draft Local Plan.
- 4.4 The figure originally seems to relate to pre-Census 2010-based Population Projections (as modelled in now superseded Edge Analytics demographic modelling). This was subsequently taken forward through the NLP Economic Futures Report which outlined that this would support

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<sup>2</sup> Planning Practice Guidance – *Housing and Economic Development Needs Assessments*

<sup>3</sup> Objectively-Assessed Needs – Final Report (PBA, Dec 2014); Strategic Housing Market Assessment (DCA, July 2014); Economic Futures 2015-30 (NLP, Dec 2014); and Greater Essex Demographic Forecasts 2012-27 – Phase 7 Main Report (Edge Analytics, May 2015)

employment growth broadly in line with past trends; with the PBA Report broadly supporting this conclusion.

4.5 These Representations have reviewed the Council's evidence and have identified three areas which the Council should consider in more detail in order to provide an assessment of the OAN need for market and affordable housing as required by the Framework. These are:

- Market Signals.
- Affordable Housing Need.
- Impact of Crossrail.

### **Market Signals**

4.6 The NPPG outlines that adjustments to assessed housing need should be made to reflect market signals, outlining that rents or prices rising faster than the national/ local average may well indicate market undersupply;<sup>4</sup> and that a worsening trend in *any* of the market signals will justify upward adjustment to planned housing numbers<sup>5</sup>.

4.7 The PBA Study shows that housing delivery has exceeded past housing targets, and based on analysis of a range of indicators suggested that there was not automatically a basis for making an upward adjustment to figures to respond to market signals. These Representations suggest that this is inconsistent with the evidence, based on the following:

- Land Values: not assessed by PBA. Residential land values at £5.1 million per hectare (based on data published by CLG) are the 2<sup>nd</sup> highest of the 12 Essex authorities. They are 53% higher than in Uttlesford and 95% above the regional average.<sup>6</sup> This points clearly to a shortage of housing land.
- House Prices: median prices are within the top 15% of local authorities nationally at £350,000. Prices in Brentwood are the 2<sup>nd</sup> highest of Essex local authorities, and 39% above the Essex average. They are similar to (1% above) those in Uttlesford.
- House Price Growth: Over the 1997-2015 period, house prices have increased by £260,000 (289%). The absolute growth in the longer-term is significantly above the average for Essex (£184,250) and the East of England (£175,000). It is above that in Uttlesford (£245,000). Price growth in proportional terms, growth over the longer term at 289% has been above that seen across Essex and the East of England (270%), Uttlesford (245%), and nationally (234%).
- Rents: median rents at £1063 PCM are 42% above the average for Essex, 62% above the East of England and 70% above the national average. They are the highest of local authorities in Essex. They have also seen the strongest growth over the 2011-15 period, increasing by a substantial 29%. This compares to 10% rental growth at a regional level and 9% nationally. It points to strong demand and an acute under-supply of rental properties.
- LQ Affordability Ratios: Brentwood is within the 15% last affordable local authorities in the Country. The LQ ratio at 10.1 was below that in Uttlesford (11.2) in 2013 but above that across Essex (7.9) and nationally (6.5). The median ratio was 8.5, which again was above Essex and

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<sup>4</sup> ID: 2a-019-20140306

<sup>5</sup> ID: 2a-020-20140306

<sup>6</sup> CLG (Dec 2015) *Land Value Estimates for Policy Appraisal*

national averages in 2013, but has deteriorated since – with evidence pointing to an increase in house prices over the last two years of 25% set against static earnings.

- 4.8 These Representations also note the conclusions of the Inspector at the Uttlesford Local Plan Examination. It was identified that Uttlesford had house prices within the top 15% of authorities within England, rents were above the Essex and England averaged and had risen by 7% since 2011, and that it was within the 10% least affordable authorities with ratios significantly above Essex and England. It was therefore considered appropriate to increase housing provision by 10% to address market signals prevalent. Comparing Brentwood to this, the majority of indicators point to stronger demand and price growth than in Uttlesford. The evidence suggests there are particular affordability problems, and a shortage of land, and clearly indicates that consideration of an upward adjustment to address market signals is warranted.

#### **Affordable Housing Need**

- 4.9 The Council's evidence indicates a need for 234 affordable homes per year.<sup>7</sup> Planning Practice Guidance is clear that:

*“The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”<sup>8</sup>*

- 4.10 There is limited evidence that the Council has considered this issue to prepare the Draft Local Plan, as the NPPG requires. Policy 7.5 in the Draft Local Plan identifies that schemes of 11+ dwellings are expected to deliver a minimum of 35% affordable housing provision. Evidently not all schemes will be able to deliver policy-compliant affordable housing provision (taking account of site viability) and some developments will fall below the threshold. Assuming 30% affordable housing delivery with a target of 362 dwellings per annum, 109 affordable homes would be delivered per annum. The plan thus can be expected to meet less than half of the affordable need – providing a clear basis considering higher provision. The need to consider higher levels of housing overall to enhance the delivery of affordable housing has been highlighted at a range of local plan examinations, including in Cambridge/ South Cambridgeshire, West Oxfordshire and Cornwall. In Warrington, the housing policy within a Local Plan has been stuck out on the basis that this issue had not been adequately considered<sup>9</sup>. The high need for affordable housing clearly points to a need to consider increasing overall housing delivery.

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<sup>7</sup> DCA (2013) Brentwood Strategic Housing Market Assessment

<sup>8</sup> Reference ID: 2a-029-20140306

<sup>9</sup> *Satnam Millenium vs. Warrington MBC [2015] EWHC 370 (Admin)*

## Crossrail

- 4.11 There is limited reference of Crossrail to inform the OAN and this is considered to be a flaw in the evidence base. The Draft Local Plan itself acknowledges that significant commuting to London; and the impact of Crossrail in improving this and increasing capacity. Policy SO7 outlines that the Draft Local Plan will seek to optimise the social and economic benefits of this; and recognises that it will create additional demand for shops and services and support the Borough's economy.
- 4.12 Crossrail will also support housing demand for people wanting to live in the Borough, given the enhanced accessibility it will deliver. Yet there is no mention in the evidence base of this. This provides a clear local driver which can be expected to enhance demand for housing relative to trend. This warrants further careful evaluation as the plan is developed.

## Delivery of Development

- 4.13 **Policy 5.2 Housing Growth** sets out sources of housing land supply as shown in Table 1 below.

**Table 1: Brentwood Draft Local Plan – Policy 5.2: Housing Growth**

	Net Homes	%
Completions 2013/14 & 2014/15	383	4%
Extant Permissions (April 2015)	444	6%
Permitted Development Allowed since April 2015	300	4%
Urban Areas (Brownfield)	1,296	18%
Brownfield Land in Green Belt	97	1%
Strategic Site	2,500	35%
Greenfield Urban Extensions in Green Belt	1,292	18%
Windfall Allowance	928	14%
Total	7,240	100%

- 4.14 **These Representations object to the housing supply breakdown set out in Policy 5.2. It is recommended that the supply of sites is re-considered because the sites set out in Policy 5.2 are not deliverable over the plan period and therefore would not achieve the housing target. This means that assuming there is no change to the housing target, sites to deliver an additional 1,500 new dwellings must be identified.**
- 4.15 **It is therefore recommended that the site at Sawyers Hall Lane is added to the Greenfield Urban Extensions in Green Belt sites to help meet the housing target.**

4.16 **The Draft Local Plan should be positively prepared and the housing sites set out in Policy 5.2 must be effective.**

4.17 The levels of housing delivery associated with the different sources of housing land supply are considered to be ambitious and are not expected to be fully delivered.

**Assessment of Housing Supply**

4.18 The assessment of housing supply considers each of the sources of housing supply below.

- Completions 2013/14 & 2014/15 – no comment.
- Extant Permissions (April 2015) – it is recommended that a 10% discount for non-delivery is applied to extant permissions. This discount is reflective of common development constraints and obstacles to delivery. This would reduce supply from this source to 400 units.
- Permitted Development Allowed since April 2015 – it is recommended that a 10% discount for non-delivery is applied to permitted development. This discount is reflective of common development constraints and obstacles to delivery. This would reduce supply from this source to 270 units.
- Urban Areas (Brownfield) – no comment.
- Brownfield Land in Green Belt – no comment.
- Strategic Site – this site relates to Dunton Hills Garden Village. A range of key issues relate to this site relating to delivery, phasing and duty to co-operate (details are set out below). As a result, during the plan period only 50% of the site can reasonably be expected to be delivered and therefore this would reduce supply from this source to 1,250 units.
- Greenfield Urban Extensions in Green Belt – no comment.
- Windfall Allowance – it is recommended that a 10% discount for non-delivery is applied to windfalls. This discount is reflective of common development constraints and obstacles to delivery. This would reduce supply from this source to 835 units.

4.19 As a result of the recommended changes above, the total housing supply would fall to 5,789 units, which represents 80% of the target. Therefore assuming there is no change to the housing target, sites to deliver an additional 1,500 new dwellings must be identified.

### **Strategic Site – Dunton Hills Garden Village**

- 4.20 The Draft Local Plan states that the Strategic Site at Dunton Hills Garden Village will deliver 2,500 units over the plan period from 2013 to 2033. This represents over one third (35%) of housing supply to achieve the proposed housing target over the plan period.
- 4.21 These Representations consider this level of development within the plan period to be completely unrealistic based upon reasons relating to suggested phasing, expected annual completion rates, duty-to –cooperate and other delivery considerations as explained below.
- 4.22 In terms of phasing, the Proposed Housing and Employment Delivery set out at Appendix 2 of the Draft Local Plan states that the site will be delivered in years 5 to 15. Therefore based upon this timeframe, annual completion rates will be on average 250 units. These completion rates are considered to be overly ambitious, with annual completions likely to be significantly lower. This is based upon professional experience of delivery rates from large strategic urban extension sites, industry knowledge and latest research on delivery rates undertaken by Savills<sup>10</sup> in October 2014 which shows that in 2013 average annual completions on urban extensions was 120 dpa.
- 4.23 At this stage the proposals to bring forward Dunton Hills Garden Village are not confirmed. It is important to recognise that total area of the proposed site lies in both Brentwood and Basildon and therefore joint-working under the duty to co-operate is essential to bring the site forward, and both authorities are currently consulting on Draft Local Plans. Most significantly, the Basildon Draft Local Plan Policy H10 refers to the “Mixed Use Development Site – West Basildon Urban Extension” for 1,000 units, to become part of Basildon urban area. The policy goes onto include four alternative options for development of which only one is “Dunton Garden Suburb” in conjunction with Brentwood. Due to the relationship of the Strategic Site, with Basildon it is considered vital that the whole Strategic Site opportunity is fully embraced by both Local Plans, especially due to the physical relationship with Basildon urban area. At present this is not the case, and therefore the contribution of the Strategic Site to Brentwood housing target is questionable.
- 4.24 Given the strategic nature of the proposals, the lead-in period to the commencement of development would be expected to be several years. This is due to the diverse range of complex tasks to be undertaken to bring forward the site e.g. adoption of the Local Plan, assembling and co-ordinating all land owners and stakeholders, preparing an agreed site wide masterplan and strategy, range of supporting technical studies etc. Therefore in a best case scenario development would be expected to start in year 5 of the Local Plan (approximately 2022/23).
- 4.25 Joint working between the LPAs under the duty-to-cooperate is encouraged.

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<sup>10</sup> Urban Extensions – Assessment of Delivery Rates, Report to Barratt Homes (Savills, October 2014)



### **Five Year Housing Land Supply**

- 4.26 **Figure 5.10 and at Appendix 3 of the Draft Local Plan** provide information on the housing trajectory. This information has been used to undertake an up-to-date assessment of land supply over the period 2015/16 to 2019/20.
- 4.27 Table 2 below clearly shows that the Council cannot demonstrate five year housing land supply. The up-to-date assessment below (based on the exact information in the Draft Local Plan) concludes that Brentwood has less than 2.5 years housing land supply. This represents a significant and serious shortfall in housing sites.
- 4.28 **As a result, these Representations recommend that sites for housing in addition to those already identified in the Local Plan must be identified to come forward in the first five years e.g. Sawyers Hall Lane. The Councils is only able to demonstrate 2.5 years housing land supply.**
- 4.29 In terms of the phasing of housing sites, the **Proposed Housing and Employment Delivery** set out at Appendix 2 of the Draft Local Plan clearly shows the reliance on Greenfield Urban Extensions in the Green Belt coming forward in the first five years of the plan. It proposes the following:
- Land at Honeypot Lane: 0-5 years.
  - Land off Doddinghurst Road: 5-10 years.
  - Land east of Nags Head Lane: 0-5 years.
  - Officer's Meadow: 0-5 years.
  - Dunton Hill Garden Village: 5-15 years.
- 4.30 Notably the five year housing land supply assessment does not include the Strategic Site as it is planned to come forward in years 5 to 10 (not the first five years).
- 4.31 The Council cannot demonstrate a five year housing land supply and therefore the Draft Local Plan is not sound.

**Table 2: Five Year Housing Land Supply Assessment**

<b>HOUSING REQUIREMENTS</b>	<b>No of Units</b>	<b>ref</b>	<b>calculation</b>
Brentwood Draft Local Plan	7,240	a	-
Plan Period 2013-2033 (years)	20	b	-
Annual Housing Requirement	362	c	a/b
<b>HOUSING COMPLETIONS</b>			
Housing Completions 2013/14 - 2014/15	383	d	-
Completed Plan Period* (years)	2	e	-
Average Annual Completions	192	f	d/e
<b>MEETING THE ADOPTED REQUIREMENT</b>			
Target to 31 March 2015	724	g	c*e
Shortfall (target minus completions)	-341	h	d-g
<b>UPDATED REQUIREMENTS</b>			
Updated Housing Target per annum	362	i	-
Five year requirement	1,810	j	j*5
Five Year Supply Target	1810	k	j
Five Year Supply Target plus shortfall	2151	l	k-h
Five Year Supply Target (+5% buffer) plus shortfall	2242	m	k(105%)-h
Five Year Supply Target plus shortfall (+5% buffer)	2259	n	k-h(105%)
Five Year Supply Target (+20%) plus shortfall	2513	o	k(120%)-h
Five Year Supply Target plus shortfall (+20%)	2581	p	k-h(120%)
<b>SOURCE (Appendix 2 Housing Trajectory)</b>			
Extant Permissions (2015/16-2019/20)	444	q	-
Permitted Development (2017/18-2019/20)	140	r	-
Windfall Allowance (post 2021)	0	s	-
Urban Area Sites	177	t	-
Brownfield Green Belt Urban Extensions	0	u	-
Strategic Site	0	v	-
Greenfield Green Belt	258	w	-
<b>TOTAL</b>	<b>1019</b>	<b>z</b>	<b>q+r+s+t+u+v+w</b>
<b>Housing Supply in Years</b>			
Five Year Supply Target plus shortfall	<b>2.37</b>	y	-
Five Year Supply Target (+5% buffer) plus shortfall	2.27	z	-
Five Year Supply Target plus shortfall (+5% buffer)	2.26	aa	-
Five Year Supply Target (+20%) plus shortfall	2.03	bb	-
Five Year Supply Target plus shortfall (+20%)	1.97	cc	-
Five Year Supply OAN Target	2.81	dd	-

### **Greenfield Green Belt Sites**

- 4.32 **Policy 7.4 Housing and Land Allocations** (including Figure 7.2 of the Draft Local Plan) set out information on the Housing Land Allocations. The allocations include Greenfield Green Belt sites of which three sites are recommended for development at Brentwood town (Honeygot Lane, Doddinghurst Road and Nags Head Lane).
- 4.33 **These Representations object to Policy 7.4. It is recommended that Policy 7.4, and supporting Figure 7.2, is revised to include the site at Sawyers Hall Lane as a Housing Land Allocation.**
- 4.34 The sequential approach towards site selection and delivery is supported, however as explained above, the delivery of identified sources of housing supply is questionable, and it is recommended that the housing target is increased. This means that the Council must identify land for at least 1,500 new dwellings (if there is no change to the housing target) to make the Local Plan sound.
- 4.35 It should be noted that the Sustainability Appraisal (Aecom, February 2016) Table C, which assesses all 264 potential site options, shows that the site at Sawyers Hall Lane achieves the same overall “score” as the three allocated Greenfield Green Belt sites in Brentwood.
- 4.36 In addition, it is important for the Council to acknowledge that the overall impact on the Green Belt designation across the Borough would be negligible if the site at Sawyers Hall Lane was released for development for reasons explained previously in this Section.
- 4.37 This is based on what is considered by the Council to be an acceptable position in **Para. 5.22 of the Draft Local Plan** which states that “If proposed development allocations set out in this Draft Plan came forward and were removed from Green Belt this would reduce by 1%. This means development needs can be sustainably met in the Borough whilst Green Belt would still make up 88% of the total area”.
- 4.38 The total site area of all proposed development allocations is 0.59%, and including the site at Sawyers Hall Lane would increase this proportion to 0.75%. Significantly the % remains less than 1% and therefore the overall impact would be negligible.
- 4.39 These Representations assume that the above % calculations exclude the Strategic Site at Dunton Hills Garden Village because its inclusion would increase the figures to over 2.5%.

## Green Belt

- 4.40 **Policy 9.11 Previously Developed Land in the Green Belt** seeks to contribute towards meeting local housing needs.
- 4.41 **These Representations support Policy 9.11, as this policy direction recognises latest Government announcements and consultation of the NPPF which recognise the important role that brownfield sites will play towards accelerating housing delivery. Any brownfield opportunities in the Green Belt should be maximised.**
- 4.42 **Therefore it is recommended that the Council acknowledge the fact that the site at Sawyers Hall Lane is a part brownfield site in the Green Belt.**
- 4.43 **Policy 9.12: Site Allocations** in the Green Belt requires allocated sites to provide “significant community benefit, both for surrounding existing communities and those moving into new homes on site”. In addition, it states that sites that will be released from the Green Belt for development will provide “new defensible boundaries to protect open countryside for future generations”.
- 4.44 In relation to providing significant community benefits, the proposals at the site at Sawyers Hall Lane would deliver a range of positive impacts. Most significantly, the proposals would secure the long-term future of Hopefield Animal Sanctuary, which is recognised as an important community facility in the Borough.
- 4.45 In relation to protecting the countryside, Section 2 of these Representations demonstrates that the site at Sawyers Hall Lane would provide new defensible boundaries.

## Infrastructure

- 4.46 These Representations support planning policies relating to quality of life and community infrastructure.
- 4.47 **Policy 10.1: Sustainable Transport** refers to joint-working to promote sustainable transport including transport considerations relating to the proposed Green Travel Route and Crossrail.
- 4.48 **These Representations support Policy 10.1 and encourage the Council to maximise any additional development potential arising from Crossrail, especially in Brentwood and Shenfield e.g. Sawyers Hall Lane.**
- 4.49 **Policy 10.9: Open Space, Community, Sport and Recreational Facilities** state that there “will be a presumption against any development that involves the loss of open space, community, sport,

recreation or play facilities, including allotments, except where it can be demonstrated that there is an excess of provision, or where alternative facilities of equal or better quality and convenience will be provided as part of the development. Where appropriate, the Council will seek provision of community and recreational facilities through the acquisition of land, joint use of existing facilities or by entering into negotiation with private landowners”.

- 4.50 **These Representations comment that in relation to the site at Sawyers Hall Lane, the proposals to bring forward the site would secure the long-term future of Hopefield Animal Sanctuary, which is recognised as an important community facility in the Borough. Section 2 of these Representations provides more information on this matter and demonstrates joint-working between the landowner and occupier. Therefore the site should be allocated for development to achieve this purpose.**

## Design

- 4.51 **Policy 6.4: Effective Site Planning** states development proposals will be favourably considered where (amongst items) “incorporate existing site features of value” and “safeguard the amenities of occupiers”.
- 4.52 **These Representations support Policy 6.4 and consider them to be relevant to the site at Sawyers Hall Lane. In particular, the proposals are designed to secure the long-term future of Hopefield Animal Sanctuary. It is therefore recommended that the proposals are favourably considered.**
- 4.53 The proposals for the site at Sawyers Hall Lane are set out in Section 5. It is important for the Council to note that they take account of planning policies set out in the Draft Local Plan including:
- Policy 10.4: Design.
  - Policy 10.5: Public Realm.
  - 10.6: High Quality Design Principles.
  - Policy 10.7: Infrastructure and Community Facilities.
  - Policy 10.8: Open Space in New Development.
  - Policy 10.13: Flood Risk.
  - Policy 10.14: Sustainable Drainage.

## 5 PROPOSALS FOR THE SITE

5.1 The proposals for the site are illustrated in the Indicative Masterplan (Figure 5).

5.2 In summary, the proposals include:

- Land to safeguard Hopefield Animal Sanctuary.
- 450 residential units, including 35% affordable housing.
- Two access points – Doddinghurst Road and Sawyers Hall Lane.
- Protection of existing features landscaping and water courses.
- Enhance landscaping – to provide new clear defensible boundary.
- Open space – in accordance with policy and best practice.
- Space of community facilities.

5.3 The proposals have been carefully designed to respect existing features and the surrounding area, including Hopefield Animal Sanctuary and the Green Belt. The indicative masterplan adopts a landscape led approach to ensure that the site is sensitively developed and to take account of existing landscaping / planting and water courses.

5.4 The gross site area is 49.8 acres / 20.2 ha, and net developable area is approximately 25 acres / 10 ha, which equates to approximately 50% of the gross area. Open space provision within the developable area is policy compliant and in accordance with best practice.

5.5 Most significantly, the indicative masterplan secures the long-term future of Hopefield Animal Sanctuary. This is achieved by retaining land which is currently used by Hopefield Animal Sanctuary. This area of land includes 5.5 acres / 2.2 ha of land in the ownership of Tesco. This land currently provides existing access to Hopefield Animal Sanctuary and accommodates a range of existing buildings including stables and visitor facilities as well as some grazing land. This design approach achieves a significant community benefit to Brentwood.

5.6 The proposals seek to bring forward a residential-led scheme for up to 450 new dwellings. This equates to an overall site density of approximately 23 dph. This figure is comparable to Greenfield Green Belt site allocations set out in the Draft Local Plan, and therefore allows for a suitable level of landscaping and green infrastructure, which is recognised as important given the existing Green Belt designation.

5.7 The residential element of the proposals has also been tested as part of the soft market testing exercise which has consulted a number of house builders and land promoters. Feedback received, in light of local market demand, clearly sought the site to provide a mix of dwelling types and sizes including approximately 20 to 30% flats. This split between housing / flats is an objective of the

proposals. The proposals would also seek to provide affordable housing provision at 35% in accordance with local policy, and could provide Starter Homes and land allowance for self-build.

- 5.8 The proposals include two access points off Doddinghurst Road and Sawyers Hall Lane. The Highways Technical Note (Waterman, February 2015) included in the February Reps explains that these two access points permit a capacity of up to 450 dwellings on-site.
- 5.9 The layout is based on the principles of the Essex Design Guide with integration of a hierarchy of routes, housing areas (high street, village green, mews), open space areas (LEAPS, LAPS) and areas of landscaping (structural, buffer, park).
- 5.10 The indicative masterplan also provides space for community facilities on-site. The exact nature of these facilities would be determined as the design process progresses.

### Design and Sustainability

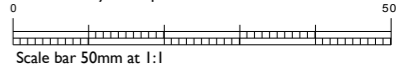
- 5.11 It is envisaged that the proposals would provide high quality housing for Brentwood town. The scale and nature of the site – for example link with Hopefield Animal Sanctuary – provides the opportunity to create a flagship and innovative project to benefit the existing and new community in Brentwood.
- 5.12 The site would be designed to promote high levels of sustainability through the design of high quality landscape and open space with varied habitats to encourage biodiversity. The retention of mature trees to the edges of the site and the planting of a variety of tree species would augment the new development and complement character areas.
- 5.13 Sustainable urban drainage in the form of swales and natural features would be designed within the high quality open space. They would be designed to slow water run-off from the development and act as flood mitigation measures.
- 5.14 The dwellings would be constructed in accordance with building regulations requirements for energy efficiency and CO2 reduction and could include sustainability measures such as High levels of insulation, Low levels of air-permeability, Passive solar design strategies, Low energy lighting, The use of environmentally benign materials, Low water use sanitary ware and Rainwater harvesting.

**Figure 5: Indicative Masterplan for site at Sawyers Hall Lane**





This drawing to be read in accordance with the specification/Bills of Materials and related drawings. No Dimensions to be scaled from this drawing. All stated dimensions to be verified on site and the Architect notified of any discrepancies.



- KEY**
- SITE BOUNDARY
  - DEVELOPABLE AREA
  - HOPEFIELD ANIMAL SANCTUARY  
APPROX. 8.75 ACRES / 3.5 HECTARES
  - EXISTING LANDSCAPE BUFFER
  - EXISTING TREES
  - EXISTING DRAIN
  - PROPOSED LANDSCAPING
  - PRIMARY ROUTE
  - SECONDARY ROUTE
  - PROPOSED BUILT FORM
  - PROPOSED ATTENUATION PONDS
  - POTENTIAL COMMUNITY USE
  - SITE ACCESS
  - PEDESTRIAN / CYCLE ROUTE TO WIDER NETWORK



REV	DATE	NOTE	BY

Project  
**PROPOSED RESIDENTIAL DEVELOPMENT  
 SAWYERS HALL FARM  
 BRENTWOOD**

Title  
**PRELIMINARY SITE LAYOUT  
 VERSION 3**

Scale 1:2500 @A3	Date MARCH 2016
Drawn KB	Checked MB

Drawing Number  
**7375/SK15**

Revision  
 -

## Phasing of Development

- 5.15 The delivery of up to 450 dwellings would be phased over a five to six year residential development period.
- 5.16 Indicative dates of development are set out in Table 3 below. This programme is based upon the new Local Plan timetable and market input from house builders. It assumes that the new Local Plan will be adopted in 2017 and that the site will be allocated for housing.

**Table 3: Initial Phasing Schedule**

Year	Indicative Date	Proposed Development
1	2017	Planning application submission and approval Purchase / agreement of off-site land for Hopefield grazing
2	2018	Infrastructure and site preparation works commence
3	2019	Residential development commences (75 – 90 dpa completed)
4	2020	75 – 100 dpa completed
5	2021	75 – 100 dpa completed
6	2022	75 – 100 dpa completed
7	2023	75 – 100 dpa completed
8	2024	75 – 100 dpa completed. Development completed.

- 5.17 The phasing of development and site construction would have no impact on the operation of Hopefield Animal Sanctuary and land for grazing purposes would be identified off-site, and Tesco would help secure this land use for Hopefield prior to the development of the site.

## 6 BENEFITS OF DEVELOPMENT

6.1 The proposals would deliver a wide range of benefits. Most significantly, by allocating the site at Sawyers Hall Lane for housing development, the long-term future of Hopefield Animal Sanctuary would be secured.

6.2 Table 4 below demonstrates how the proposals would help achieve the Council’s strategic objectives as set out in the Draft Local Plan.

**Table 4: Strategic Objectives**

Strategic Objective		Description
<b>Managing Growth</b>		
SO1	Direct development growth to the Borough’s transport corridors and urban areas in locations well served by existing and proposed local services and facilities.	The site is located in the heart of the A12 Growth Corridor and therefore should be a focus for development. It adjoins the main town of Brentwood and is well served by, and accessible to, a range of community services and facilities.
SO2	Manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities.	The site is capable of being delivered without significant infrastructure investment. Two existing access options are available and feasible. Issues relating to capacity of existing services and facilities are relevant to all sites.  The proposals secure the long-term future of Hopefield Animal Sanctuary which is an important local community facility.
<b>Sustainable Communities</b>		
SO3	Plan for housing that meets the needs of the Borough’s population and contributes to creating inclusive, balanced, sustainable communities.	The site would provide new housing to meet local needs, including affordable housing provision (potentially Starter Homes). The site would contain a mix of uses, including Hopefield Animal Sanctuary plus other community space to benefit the local and new community.
<b>Economic Prosperity</b>		
SO4	Foster a prosperous, vibrant and diverse local economy by attracting new commercial investment in order to maintain high and stable levels of economic and employment growth.	The scale of development would provide a new population representing a critical mass to deliver positive impacts on the town centre e.g. increased spending, levels of activity, supporting local services etc. The proposals would provide new local employment opportunities in relation to the construction period.  In addition, the proposals secure the long-term future of Hopefield Animal Sanctuary which is an important local community facility (which effectively runs as a local visitor attraction and therefore brings investment to the site).
SO5	Expand and enhance Brentwood Town Centre’s retail offer in particular	The scale of development would provide a new population representing a critical mass to deliver

	opportunities for high quality niche shopping.	positive impacts on the town centre e.g. increased spending, levels of activity, supporting local services etc.
SO6	Promote and encourage the continued success of Brentwood Town Centre and local centres to provide a high quality public realm and mixed use development.	The scale of development would provide a new population representing a critical mass to deliver positive impacts on the town centre e.g. increased spending, levels of activity, supporting local services etc.
SO7	Optimise the social and economic benefits that arise from Crossrail for the benefit of residents, businesses and visitors to the Borough.	The site adjoins Brentwood town and is in walking distance to the railway station. Given this significant strategic transport investment at Crossrail, Brentwood will become a more population residential location, and therefore available, suitable and deliverable sites e.g. Sawyers Hall Lane must come forward for development.
SO8	Promote and support a prosperous rural economy.	N/A
<b>Environmental Protection &amp; Enhancement</b>		
SO9	Safeguard the Green Belt from inappropriate development and enhance its beneficial use.	The site is considered to make a limited / low contribution towards the Green Belt purposes. It is well defined and would not compromise the role and function of the Green Belt.
SO10	Protect and enhance valuable landscapes and the natural and historic environment.	The site does not impact on protected landscapes or the historic environment.
<b>Quality of Life &amp; Community Infrastructure</b>		
SO11	Protect and nurture existing leisure, cultural and recreational assets such as the Borough's Country Parks for residents and visitors to the Borough and promote and enhance social inclusion, health and wellbeing.	Significantly, the proposals secure the long-term future of Hopefield Animal Sanctuary which is an important local community facility.
SO12	Improve public transport, cycling and walking facilities and encourage sustainable transport choices.	The site is located in close proximity to a range of local services and facilities. Therefore many journeys would be taken by foot, cycle or public transport and this would reduce use of the private car.
SO13	Secure the delivery of essential infrastructure, including transportation schemes and community facilities in order to support new development growth throughout its delivery.	Significantly, the proposals secure the long-term future of Hopefield Animal Sanctuary which is an important local community facility.

## 7 CONCLUSION AND NEXT STEPS

7.1 The preparation of a new Local Plan is supported however it must conform with the NPPF tests of soundness.

7.2 These Representations are submitted to Brentwood Borough Council with the intention of assisting in the formulation of a sound Local Plan.

7.3 In conclusion, at present, the Draft Local Plan is considered to be not sound. Specifically it is:

- **not positively prepared** because the strategy for growth including the proposed housing target is not based on a national policy compliant calculation of objectively assessed needs. It must consider market signals, affordable housing needs and the impact of crossrail. The duty-to-cooperate with adjoining authorities is not evident and the Draft Plan does not provide a strategy to achieve the proposed housing target. To become sound, the proposed housing target must increase and additional land for housing must be allocated to deliver the strategy.
- **not justified** because the strategy is not appropriate and it cannot be delivered. To become sound, additional land for housing must be allocated to deliver the strategy.
- **not effective** because the plan is not deliverable. The identified source and supply of housing sites will not be delivered over the plan period and will not achieve the proposed housing target. In addition the Council cannot demonstrate a five year housing land supply, and there is a lack of evidence of joint-working with neighbouring authorities through the duty-to-cooperate. To become sound, additional deliverable and suitable sites for housing be identified to come forward in the first five years; and,
- **not consistent with national policy** because the proposed housing target has not been prepared in accordance with the NPPF or NPPG.

7.4 Overall it is recommended that the site at Sawyers Hall Lane should be identified as a Housing Land Allocation in the Local Plan. Significantly, bringing forward the site would help contribute towards addressing the key issues set out above in relation to soundness.

7.5 The proposals at Sawyers Hall Lane would address key planning issues. They provide clear defensible boundaries to safeguard the countryside, do not lead to adverse impact on the local transport network and are the site represents a highly accessible and sustainable location.

7.6 The proposals are also able to deliver a range of social, economic and environmental benefits to Brentwood (as set out in Table 4) and would meet the Council's strategic objectives. Most significantly, the proposals are deliverable and would secure the long-term future of Hopefield Animal Sanctuary.

### Next Steps

7.7 Tesco Stores Limited is keen to continue to engage with Brentwood Borough, in relation to the emerging new Local Plan. The project team are keen to provide evidence to provide the Council and Members to help make the case to bring the site forward, and are able to respond and address any issues raised.