

Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

17th March 2016

Dear Sirs

Consultation to Draft Local Plan – Promotion of Site at 75 Pear Tree Lane, Doddinghurst

Objection to Policy 7.4: HOUSING LAND ALLOCATIONS

Following the “Call For Sites” consultation and subsequent drafting of the preferred options, my client’s site at the above address has not been identified as Housing Land Allocation, as contained within Figure 7.2. On this basis I wish to object and provide the following information to demonstrate why the site should be allocated.

Limitations of the Draft Local Plan

It has been widely publicised that the proposed draft allocations are heavily reliant upon the Dunton Hills Garden Village, which relies upon acceptance from Basildon Council. Furthermore, the first draft does not allow for any strategic growth within the north of Brentwood. Such an approach runs the risk of effectively killing off the planned growth of the towns and villages that comprise the north of the District.

Within the adopted and emerging local plan Doddinghurst is recognized as being a sustainable settlement. Such places should be allowed to grow in a controlled and sustained manor to help provide much needed market and affordable housing. There are no Brownfield sites within towns and villages to the north of the District capable of triggering requirements for affordable housing.

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As part of the current consultation to the draft local plan my client would like to put forward their land for inclusion within the site allocations for residential development. The site in question comprises part of the residential curtilage of no. 75 Pear Tree Lane. Below is an extract from a O.S. plan illustrating the site in question and its relationship to Doddinghurst.



It is located directly adjacent to the defined settlement limits within the Green Belt. Paragraph 80 of the NPPF sets out five purposes that Green Belts serve. Each are identified and addressed as follows:

- i. **Check the unrestricted sprawl of large built up areas.** The site and proposed allocation for housing does not constitute a sprawling extension to a large built up area. There is existing built form on the site which is to be demolished and replaced and a net increase of approximately 6 to 10 dwellings is sought.
- ii. **Prevent neighbouring towns merging into one another.** The site in question is surrounded by residential curtilages. Its allocation would represent a small and sensible extension for the defined settlement limits to provide much needed market and affordable housings. It would not result in the merging of towns.
- iii. **Assist in safeguarding the countryside from encroachment.** The definition of encroach is defined as ‘to extend into’. The development of the site will in no way whatsoever result in an encroachment as proposed buildings are contained within a well defined site, bounded by landscaping. Also, as identified above, the site is bounded by residential curtilages and so not only would not encroach into the countryside but would also not impact upon its wider setting.
- iv. **Preserve the setting and special character of historic towns.** The application site is not within or adjacent to a historic town.
- v. **Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.** It is acknowledged that residential curtilages no longer fall under the definition of “brownfield land” within the NPPF, as they once did within the superseded guidance. However, the purpose of identifying the reference to brownfield land is to ascertain the basic principles the NPPF requires to be considered when determining proposals located within the Green Belt. To summarise, the NPPF recognises that sites can be developed in the Green Belt where they do not harm its function and openness.

Summary

In accordance with the NPPF the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

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In this instance the allocation of my client's site will allow for a logical extension of Doddinghurst in accordance with the above. It will allow for a clear and planned growth of Doddinghurst within what is residential site surrounded by other residential dwellings. The site offers a defensible boundary to ensure the development of it would not result in urban spiral or encourage any encroachment into the open countryside.

For the reasons outlined within these representations it is put to the Council that my client's site should be included within the local plan as a housing allocation.

Should you wish to discuss the content of this letter further or require any additional information please do not hesitate to contact me.

Yours faithfully

BEN WILLIS BA (Hons) PG/DIP MRTPI

DIRECTOR
WINGFIELD PLANNING CONSULTANCY