



**BRENTWOOD
BOROUGH COUNCIL**

Draft Local Plan

2013 - 2033

February 2016

COMMENT FORM

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

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

All responses should be received by Wednesday 23 March 2016

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

Data Protection

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

By submitting this form you are agreeing to these conditions.

PERSONAL DETAILS

Title: First Name: Last Name:

Address:

Post Code:

Telephone Number:

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):

Draft Local Plan for Brentwood (January 2016)

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

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

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

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

- New site proposed.

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

Support	<input type="checkbox"/>	
Object	<input type="checkbox"/>	*New Site Proposed*
General Comment	<input checked="" type="checkbox"/>	

Comments (please use additional sheet if required):

Introduction

This representation letter is submitted by Dalton Warner Davis LLP (DWD) on behalf of Clockwork Farms Ltd, the landowner of a Green Belt site located towards the northern side of Church Road in Noak Hill village which is approximately 2 miles to the north of Harold Hill District town centre (site outlined in red Appendix 1).

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

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

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

Site Location and Context

The site (outlined in red in Appendix 1) is located in the west of Brentwood Borough and the London Borough of Havering (LBH) boundary abuts it to the south east (dotted in black). The Crown Kennels site (outlined in blue) which adjoins the site to the east is within LBH and is also owned by Mr Patel. Harold Hill town centre is approximately 2 miles to the south of the site and is one of the six district centres which make up the wider urban area. The northern edge of Harold Hill is approximately 1 mile from the site. The site is approximately 3 miles from Harold Wood national rail station. Romford Metropolitan town centre is 4 miles to the south west of the site.

The site is a brownfield site of approximately 9.5ha in size and predominantly comprises open fields with barns as follows:

- Large agricultural barn measuring 600sqm and a further barn divided into four sections.
- The stable yard is a Quadrangle with a purpose built stable block comprising 18 loose boxes
- A grassed area of land adjacent previously used as a greyhound training track.

The site is accessed from Church Road via a gated entrance and long drive way. There is also an additional access gate directly on to the site from Church Road. Church Road connects with Noak Hill Road which leads into Harold Hill.

The surrounding area primarily comprises of open fields with a number of dispersed buildings. Priors Golf Course abuts the site to the north which is bounded by the M25 to the north, approximately 500 metres from the site. Wimberley Hall Farm which contains two agricultural barns is located to the south west. Adjacent to the east of the site is the Crown Farm Kennels site (no longer in use) which contains a large five bed bungalow with additional annex accommodation, purpose built kennels and a cattery. Further to the east is an area of open land beyond which lies an area of land containing mobiles homes/caravans and single storey buildings sited in hardstanding.

To the south east of the site on the northern side of Church Road lies 'The Poplars' a two storey dwelling with a single storey side extension and standalone garage building. Further to the south on the southern side of Church Road is Ranscombe Cottage, a two storey dwelling which has been subject to a number of extensions with various large barns located deeper within the plot.

Planning policy context

The site currently falls within the Green Belt but is not subject to any landscape, environmental, open space, biodiversity or heritage designations. There are no known contamination issues on the site and it is not in an area identified as having potential for flood risk. Curtismill Green Site of Specific Scientific Interest (SSSI) is located approximately 0.8 miles to the north west.

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

Planning history

The site does not have any recent or relevant planning history. The site has not previously been put forward for consideration as part of Brentwood's Local Development Plan process.

Green Belt Urban Extensions

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

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

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

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

The site is in close proximity (about 1 mile) to the northern edge of Harold Hill district centre. The existing Crown Farm Kennels brownfield site is adjacent to the site to east, the Priors Golf Course and M25 to the north, Watton Green hamlet to the west and Church Road to the south could all potentially act as strong physical barriers to restrict any further development into the Green Belt land beyond.

Purpose 2: To prevent neighbouring towns merging into one another

The site contributes to a sense of separation between Watton's Green and Noak Hill settlements (particularly from an aerial view) however it is less significant than the open expanse of land to the south of the site which separates Noak Hill from the larger urban town of Harold Hill. Local topography, vegetation and dispersed settlement along Church Road mean that the site is relatively well screened from the wider countryside.

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

The site is part of a wider area of Green Belt which assists in safeguarding the countryside from encroachment from the surrounding developed areas (including Hornchurch, Upminster, Rainham, Elm Park and Collier Row). The site is not in use and contains empty barns which perform limited countryside functions.

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

This function is not considered relevant to the site or the wider Green Belt in Brentwood as the towns within the borough do not have a historic character and no historic designations have been applied. The site does not fall within a Conservation Area or a Historic Park or Garden which is the primacy consideration as confirmed in the draft 'Assessment of Potential Housing Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation' (1 March 2016).

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

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

Conclusion and Recommendations

The site contributes to the general role of the Green Belt in the local area in performing the Green Belt functions of: restricting urban sprawl, safeguarding the countryside from encroachment. However, the site is not widely visible and does not perform a key role in performing these functions.

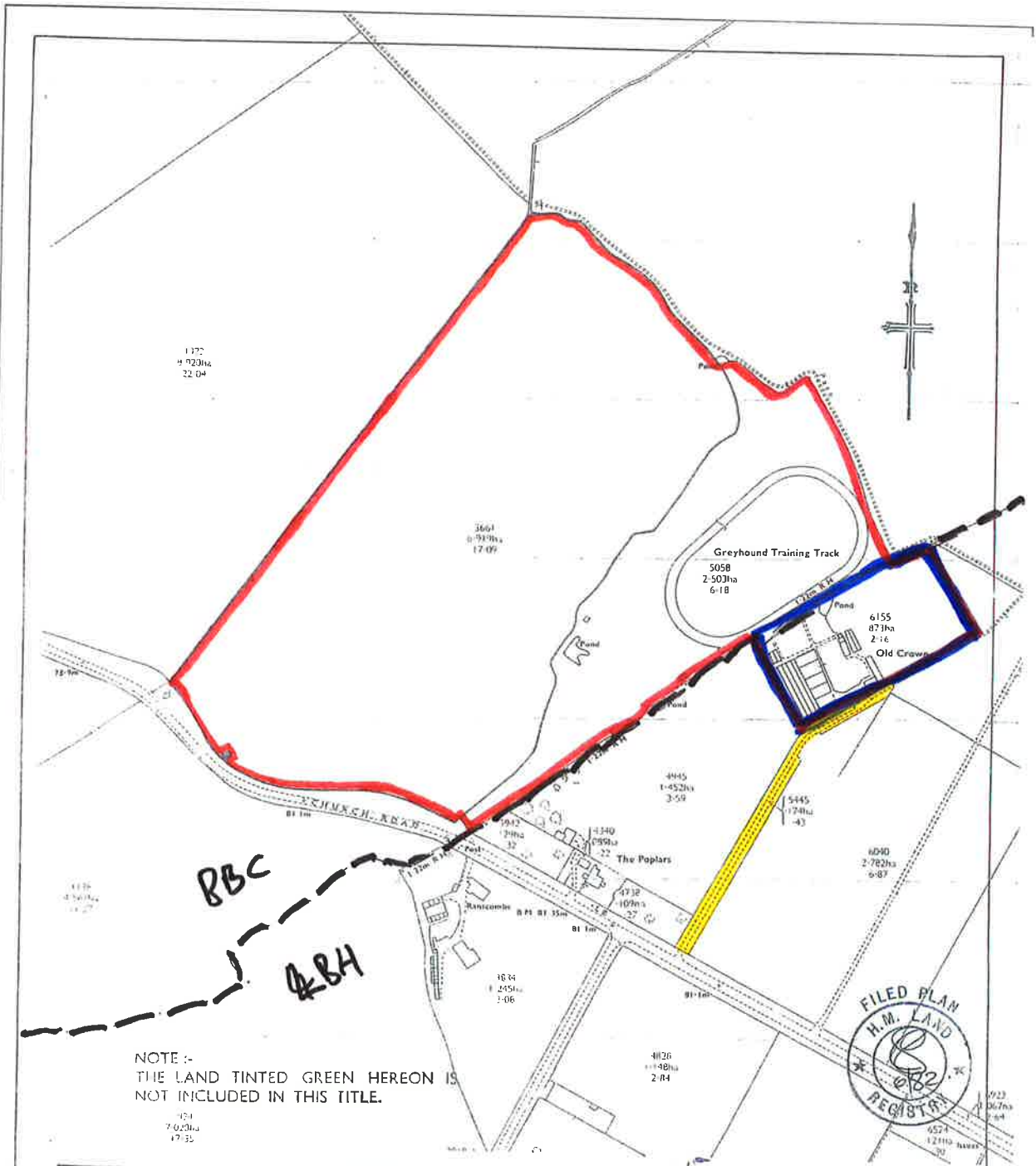
There are existing physical and defensible boundaries created by the existing Crown Farm Kennels site, Priors Golf Course and M25 and Church Road, which would prevent further sprawl should this site come forward for development.

The site is available now and does not have any environmental or heritage policy constraints. The site has an existing access from Church Road. There is also an additional access gate directly on to the site from Church Road which could be utilised should the site come forward for development.

The site is 9.5ha in size and if a 'Green Belt density' of 30 dwellings (dw) per hectare (ha) were to be applied, the site could potentially accommodate around 285 dwellings. If this site was brought forward for low density housing development there would be a total contribution of 285 dwellings which equates to 78% of Brentwood's annual target of 362 new dwellings per year.

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

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



NOTE :-
THE LAND TINTED GREEN HEREON IS
NOT INCLUDED IN THIS TITLE.

H.M. LAND REGISTRY		TITLE NUMBER	
		EX 255950	
ORDNANCE SURVEY PLAN REFERENCE	TQ 5394	SECTION	Scale 1/2500
COUNTY ESSEX	DISTRICT BRENTWOOD		© Crown copyright

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