

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

17<sup>th</sup> March 2016

Dear Sirs

## **Consultation to Draft Local Plan – Promotion of Site at Hatch Road, Pilgrims Hatch**

In accordance with the Council consultation stage of the Local Plan preparation, my client wishes to make the following representations. Please find accompanying these representations the following supporting documents:

- Contamination Report (ref 800 R01: Issue 1) – prepared by GEMCO
- Extended Phase 1 Habitat Survey – Prepared by Practical Ecology Ltd
- Tree Survey & Constraints Plan (ref: 4991) – Prepared by Hayden’s Arboricultural Consultants
- Annex A - Historic Maps
- Concept Plan (ref: 8239) – Prepared by LAP Architects
- Indicative Plan (ref: 8239/SK01) – Prepared by LAP Architects

## **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.

## **Classification of Site – Development in the Green Belt**

Within the Council's initial assessment it was not considered the site represented brownfield land. The definition of previously developed land is contained within the NPPF, which states *"Brownfield (previously developed) land is defined in Annex 2 of the National Planning Policy Framework as 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 have blended into the landscape in the process of time.*

Contained within accompanying Annex A are a set of historic maps of the site and the surrounding area provided by Groundshare Insights and Ordnance Survey. These maps demonstrate that from around the 1920's onwards my client's site, and surrounding areas, was used as a commercial nursery. The O.S. plans illustrate that almost all of the western section of the site contained glasshouses and other associated buildings used in connection with the operational use.

In accordance with the O.S. plans within Annex A, sometime between 1959 and 1966 the operational use of the site ceased, with the nursery buildings to the west and south of my clients site being development for housing. The buildings within my client's site were never removed, but instead left vacant.

Present day, only the bases of the former buildings remain, along with evidence of the brick walls, and collapsed structures. The site has become overgrown in parts, with the land to the east comprising unmaintained woodland.

In this instance it is acknowledged that the final excluding definition of the above criteria for considering land as brownfield, in that the remains of the permanent structure have blended into the landscape in the process of time. However, it has been demonstrated within Annex A that the site has previously formed a brownfield site.

## **Land Contamination**

Accompanying this representation is a land contamination survey prepared by GEMCO. To summarise, the survey has identified several 'moderate' risk potential sources of contamination from on-site and, from off-site sources also considered to be 'moderate' risk. These are from the historical use of the site as a commercial garden centre (such as chemical storage and glass from the former glasshouses), and also from illegal fly tipping. The allocation and development of the site will allow the remediation work to take place for decontamination. This will be particularly prevalent to the proposed large area of public open space within the woodland, which represents a significant environmental enhancement.

## **Enhancement of Environment and Ecology**

In this instance it is considered there represents an opportunity to positively enhance the environmental and ecological quality of the site through a development led proposal. Prior to any indicative plans being drawn up my client instructed surveys to be undertaken by qualified ecologists and arboriculturalists.

To accompany this representation is an Extended Phase 1 Habitat Survey (Prepared by Practical Ecology Ltd). Within this report a number of enhancement measures are suggested which can be implemented into the scheme. As illustrated within the indicative layout, the development of the site would allow the enhancement of an area of woodland to the east. The Arboricultural report (prepared by Haydens Arboricultural Consultants) provides a set of conclusions and recommendations for treating existing trees and also management of the wooded area.

The accompanying indicative plan has taken on board the comments raised by the specialist consultants to help inform its design. The existing landscape along the northern boundary will be retained and enhanced to provide a natural barrier. This serves to protect the development from causing visual harm to the wider landscape character, and provides natural ecological habitat. The

wooded area to the east will be enhanced as per the recommendations of the ecologist and arboriculturalist to allow its use as public open space.

## **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. In this instance the allocation of my client's site will facilitate a deliverable site already in advanced stages in planning investigation. The indicative plan has demonstrated that it can be developed whilst having regard to all three parameters of sustainability. To summarise it can provide:

- Market housing and 35% affordable housing
- New commercial floor space for local shops and facilities
- Community uses where deemed necessary (such as community centre, doctors surgery)
- Significant environmental improvement through the decontamination of the land and ecological enhancements
- Provides a natural landscape barrier along the northern boundary to protect the open countryside and the function of the Green belt
- Creation of a large area of public open space in the form of an enhanced area of woodland
- Easy access to public transport links to avoid reliance on private transport

Concern is also raised to the draft inclusion of working garden centres at Sow and Grow Nursery and Ingatestone Garden Centre. These represent clearly definable employment sites and working nurseries. The loss of these employment sites for housing is counterintuitive to the principles of sustainable development. Whilst they satisfy the social limb of sustainability they will result in a severe negative impact upon the economic limb.

## **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 accordance with paragraph 80 of the Planning Practice Guidance, 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.

In this instance the allocation of my client's site will allow for a logical extension of Pilgrims Hatch in accordance with the above. It will allow for a clear and planned growth of Pilgrims Hatch within what is a derelict former brownfield site. The site has a history of being previously developed, being occupied as a commercial nursery. Whilst the buildings have since disappeared from the site, their foundations exist and the land remains contaminated and derelict. 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**