



**BRENTWOOD
BOROUGH COUNCIL**

Draft Local Plan

2013 - 2033

February 2016

COMMENT FORM

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

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

All responses should be received by Wednesday 23 March 2016

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

Data Protection

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

By submitting this form you are agreeing to these conditions.

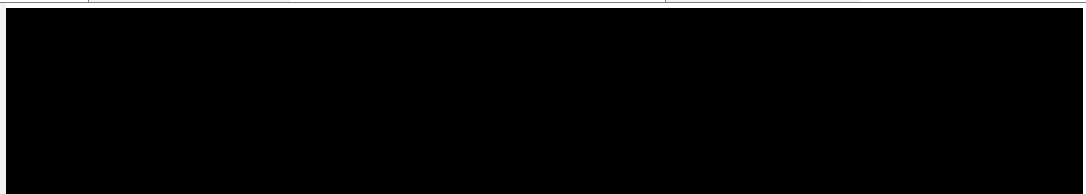
PERSONAL DETAILS

Title: **Mr**

First Name: **David**

Last Name: **Russell**

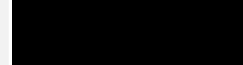
Address:



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):

Policy 5.2: Housing Growth / **Policy 7.4:** Housing Land Allocations / **Policy 10.11:** Air Quality / **Policy 9.12:** Site Allocations in Green Belt / **Policy 7.2:** Housing Mix, Types and Tenures / **Policy 7.5:** Affordable Housing

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

Support

Object

General Comment

Comments (please use additional sheet if required):

Please see statement attached to this form.

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

Brentwood Borough Council
Brentwood Draft Local Plan 2013-2033
Consultation February 2016

Representations on behalf of
Wiggins Gee Homes Ltd

(Site 159 – Land off Crow Green Lane, Pilgrims Hatch)

March 2016



1 Introduction

- 1.1 For some years now, we have been promoting 2.8 hectares (6 acres) of land off Crow Green Lane, Pilgrims Hatch, for Wiggins Gee Homes Ltd, as a housing development allocation for inclusion in the local development plan, now known as the Brentwood Borough Local Plan. The land is referred to in the Strategic Growth Options Consultation 2015 document as Site 159, and we refer to Site 159 throughout for ease of reference. We have also put the site forward through the Council's SHLAA process, under reference G057. See location and site plans at Appendix A.
- 1.2 We have also been aware that Brentwood has a high percentage of Green Belt land, some 89%, significantly constraining development opportunities. Whilst some adjustments have been made to the current Green Belt boundary to accommodate growth, we firmly believe this to be insufficient along with other sites flagged up in the Brentwood Draft Local Plan for reasons given below.
- 1.3 Site 159 would go some way to providing housing and local community infrastructure in that part of the Borough. It would in effect be an ideal extension of a large existing urban area. The site directly abuts existing housing in Pilgrims Hatch.
- 1.4 The appropriateness of Site 159 is discussed in detail below, together with the inappropriateness of some sites that it is suggested be allocated.
- 1.5 We address issues that relate to housing policies and environmental matters. We have not at this stage discussed in any great detail Central Government policies or advice. However, recent Central Government edicts and local surveys identify the need for starter and small family homes and previously in the case of Brentwood, provision for the elderly, play areas and decent shop(s) in Pilgrims Hatch. Homes are required for the private market together with affordable housing of all tenures. Site 159 at Crow Green Lane is in one ownership and is readily available to provide these in accordance with the Council's design and layout standards.

2 Policy 5.2: Housing Growth

- 2.1 Policy 5.2 states an overall need for around 7200 additional dwellings in the Borough during the period 2013 to 2033. However, we believe all figures should be rounded to the nearest hundred, to reflect the significant levels of uncertainty that must be taken into account when forecasting for such a long period of time.
- 2.2 The Draft Plan presents the housing growth figures, in particular the proposed housing trajectory, in a way that makes it difficult to comment in detail. Paragraph 5.46 states that Figure 5.10 sets out the expected rate at which new homes will be provided, although in fact it is Figure 5.11 that does this. Figure 5.11 covers the period 2016 to 2033, but it would have been more logical for it to cover the whole of the plan period, namely 2013 to 2033. The trajectory includes allowances, as set out in paragraph 5.47 and which are further detailed on an annual basis in Appendix 3.
- 2.3 Going back to paragraph 5.46, this states that further details of the rate at which new homes will be provided are given in Appendix 2. Appendix 2 lists some 22 sites, also set out in Figure 7.2: Housing Land Allocations, that together are expected to provide some 5155 (5200) new dwellings. Appendix 2 states which five year period each site is expected to deliver as follows:

Period	No of sites	Total dwellings
0 to 5 years	8	1197
5 to 10 years	12	1258
10 to 15 years	0	0
5 to 15 years	2	2700
Total	22	5155

- 2.4 It is only Appendix 3 that sets out projected housing completions on a year by year basis. However, Appendix 3 only includes 18 of the 22 allocated sites listed in Appendix 2. Missing are:
- Dunton Hills Garden Village – 2500 dwellings
 - Victoria Court, Victoria Road, Brentwood – 40 dwellings
 - Baytree Centre, Brentwood – 200 dwellings
 - Ingatestone Garden Centre – 60 dwellings.
- 2.5 We assume that the Housing Trajectory shown at Figure 5.11 includes the four allocations missing from Appendix 3, and has allocated them on a year by year basis. It would have been useful if Appendix 3 had included all the proposed allocations and the figures used to construct Figure 5.11.
- 2.6 Paragraph 5.46 states that the proposed housing trajectory:
- “... displays the difficulty moving from significantly lower housing delivery up to objectively assessed needs in a short space of time”.*

However, the National Planning Policy Framework makes it clear in paragraphs 14 that:

“Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change”.

- 2.7 One thing is abundantly clear from the Plan's housing figures is that housing completions have been below target since 2012 and are unlikely to meet the new target until 2018, a projection that we would regard at best as hopeful. We believe the problem stems partly from promotion of sites by the Council through the Local Plan process that either have little hope of being implemented or at least are subject to serious constraints. We believe the Local Plan as it stands runs a serious risk of being found unsound against national policy as set out in the NPPF's paragraphs 14 and more recent Central Government advice.

3 Policy 7.4: Housing Land Allocations

- 3.1 As we have stated in our representations on Policy 5.2 above, part of the issue about making the transition from a relatively low housing delivery level to the one based on the Objective Needs Assessment is the nature of the development land allocations being proposed.
- 3.2 It is likely that smaller allocations will be those able to deliver at the beginning of the plan period. It will be some time before the strategic greenfield sites can start delivering, given that they will require initial master planning followed by individual planning applications as each part of the site comes forward. Large land allocations are also likely to be developed using the housebuilding industry's strategic land trading business model, which can delay as much as progress housing delivery, depending on market conditions.
- 3.3 The biggest of the strategic allocations is Dunton Hills Garden Village. The Dunton Hills Garden Suburb Statement of Consultation, published in December 2015, refers to this proposal in paragraph 1.2 as *"an informal planning concept"* developed to *"test the idea of a cross-boundary project"* providing between 4000 and 6000 new dwellings.
- 3.4 The Statement says in paragraph 2.3 that it *"... will inform both Basildon Borough Council and Brentwood Borough Council's decision about whether there are planning merits to consider a cross-boundary development option at Dunton in their respective Local Plans ..."*. The paragraph goes on to say that if a decision is taken to consider the project further, *"... the Memorandum of Understanding will need to be reviewed and new working arrangements put in place to proceed jointly."*
- 3.5 The consultation itself was carried out in January and February 2015. 84% of those who responded objected to the proposal; only 6% supported it. The main issues raised by respondents were:
- Potential environmental damage and erosion of Green Belt protection
 - Infrastructure provision not being able to cope with additional development
 - Delivery feasibility of the project.
- 3.6 As things stand, this looks like a project that is going nowhere, and there must be very serious doubts over when this proposed allocation will start to make a contribution to the housing needs identified in Policy 5.2. Indeed, it may never do so.
- 3.7 The other strategic greenfield sites, Officer's Meadow, Shenfield; Honeygot Lane, Brentwood; and Nags Head Lane, Brentwood, are all included in Appendix 3's Housing Trajectory. All are shown as starting delivery in 2018. This is less than two years from now and, in our opinion, it is unlikely that delivery from these sites will start much before end of 2020, beginning of 2021.
- 3.8 The three other large allocations set out in Policy 7.4 are:
- land off Doddington Road, Brentwood

- Priest's Lane, Brentwood
- land at West Horndean.

3.9 The Doddington Road site is programmed to start delivery in 2020. We have objected strongly to this allocation in past consultations, as the land lies astride a major trunk road, the A12. See below.

3.10 Policy 10.11: Air Quality

3.10.1 The Council places great emphasis on promoting measures to improve air quality and states *“Planning permission will not be granted for development where there is likely to be an adverse impact on air quality”*.

3.10.2 A report, published on 1 February 2016 under the title “Every Breath We Take” warns that the impact of air pollution on health is far greater than previously thought. Prepared jointly by the Royal College of Physicians and the Royal College of Paediatrics and Child Health, the report states that, nationally, 40,000 people die early every year as a result of outdoor air pollution.

3.10.3 One of the principal sources of air pollution is diesel engine fumes. A typical diesel car emits ten times as much nitrogen dioxide as its petrol engined equivalent. It is now known that nitrogen dioxide and particulates emitted by road vehicles are seriously damaging to human health. As well as carrying high volumes of car traffic, the A12 is also a principal route for large lorries running to and from the port of Felixstowe. It is bad planning to allocate land for new housing in such close proximity to a major source of air pollution in Brentwood.

3.10.4 Among the recommendations made in “Every Breath We Take” is the following:

*“Protect those most at risk. Children, older people, and people with chronic health problems are among the most vulnerable to air pollution. Public services must take account of this disproportionate harm through local tools such as **planning policies for housing and schools** ...”*

3.10.5 We firmly believe due consideration should be given to this recommendation.

3.11 It is the smaller allocations that are likely to make an early contribution to meeting what is already a significant housing shortfall in Brentwood Borough. The last Five Year Deliverable Housing Supply Assessment, published in June 2014, recorded a 4.3 year supply, well below the level required by the National Planning Policy Framework. Completions in 2014/15 were an improvement on 2013/14, but at 159 additional dwellings, still well below the annual housing target for 2013 to 2033 of around 360.

3.12 Policy 7.4 includes 15 smaller housing land allocations with capacities ranging from 10 to 80 units. Of these, 6 with a total capacity of around 240 dwellings are still subject, in whole or part, to a Council asset review. It cannot be assumed that all of these will be available for new housing during the next five years, or indeed at any

time in the future up to 2033.

- 3.13 This leaves 9 allocations with potential to deliver early in the plan period and help relieve the current significant shortfall in supply. These allocations have a total capacity of around 390 new dwellings and are:
- Wates Way Industrial Estate – 80 dwellings
 - Essex County Fire Brigade HQ – 50 dwellings
 - Warley Training Centre – 50 dwellings
 - Westbury Road Car Park – 22 dwellings
 - Chatham Way/Crown Street Car Park – 26 dwellings
 - Hunter House Western Road – 22 dwellings
 - Sow and Grow Nursery Pilgrims Hatch – 37 dwellings
 - Ingatestone Garden Centre – 60 dwellings
 - Ingatestone Bypass – 42 dwellings.
- 3.14 However, even amongst these there must be doubts over their ability to deliver early. Two are currently town centre car parks. A further two are public service establishments, whose future may be liable to further public service review. We are therefore down to 5 sites with a capacity of around 240, which over a five year period would represent an annual production of barely 50 dwellings per year. Added to this would be the delivery from planning permissions already given but yet to be implemented; an allowance from permitted development conversions of offices to residential, and a windfall site allowance. The net result is an annual production of around 150 to 200, well under the 360 target. Even though it may prove possible to achieve some delivery during the first five years from the bigger strategic sites (there is some doubt as set out above), this still leaves the Draft Local Plan struggling to meet its target.
- 3.15 The Local Development Scheme states that the new Local Development Plan is scheduled for adoption by the second quarter of 2017. Even if this is achieved, its land allocations will still need to be based on very robust foundations. In April 2015, East Cambridgeshire adopted its new Local Development Plan. On 23 June 2015, the Inspector considering an appeal against the decision of East Cambridgeshire to refuse development on a site in the village of Witchford, issued his formal decision. He concluded that the Council could not demonstrate a five year supply of deliverable housing sites. As a consequence, he decided, in accordance with paragraph 49 of the NPPF, that the newly adopted Plan's housing supply policies were out of date. This was in spite of the fact that only a few months earlier the Inspector carrying out the Examination in Public of the LDP had concluded there was a five year supply as required by the NPPF and that the Plan was sound in this respect. The Council is currently having to review its recently adopted plan and its housing land allocation policies.

4 Policy 9.12: Site Allocations in Green Belt

4.1 As stated previously, we have been promoting our clients' site at Crow Green Lane, Pilgrims Hatch over a number of years. It is a relatively small site, with a capacity of up to 70 or so dwellings together with local community infrastructure. See indicative layout drawings at Appendix B. As we demonstrated in our representations to the Council's 2015 consultation on Strategic Growth Options, developing this land would have a negligible effect on the Green Belt's functions in this locality. We have pointed out the site's benefits on many occasions now. For this consultation they can be summarised as follows:

- a sustainable location in terms of access to existing local community and commercial facilities including schools
- well served by existing public transport services
- situated immediately adjacent to an established residential area
- site has wholly defensible boundaries
- can be serviced by the utilities
- appropriate site access, as discussed with the Council's Highways
- does not flood
- one ownership
- readily available
- readily achievable
- and therefore ideally suitable.

4.2 It is a greenfield Green Belt site, but the Draft Plan acknowledges that sites like these are crucial if the Borough is to meet its objectively assessed needs, and to show that it is doing so with sufficient flexibility to meet rapid change. Given the current and future critical housing supply situation in the Borough, the Crow Green Lane site is eminently suited to making an early contribution to this need without any damage to the functions or purpose of the Green Belt. See extract from our representation to the Strategic Growth Options Consultation January 2015 attached at Appendix C. The Council needs sites like this, with a high degree of certainty about its deliverability. Otherwise, it faces continuing challenges through the plan preparation and appeal processes.

5 Policy 7.2: Housing Mix, Types and Tenures

- 5.1 We note in particular Policy 7.2's provisions concerning homes suitable for occupation by older people, or people with disabilities, and on self or custom build properties. The ageing demographic has been one of the constant issues in the Local Plan process, and one that we have always been prepared to address in any way we can in developing our clients' site. Policy 7.2 as drafted sets out a self-build requirement for sites with capacity of 100 or more dwellings. Our clients' site has a smaller capacity, but the provision of some plots for self or custom builders would be something our clients would be willing to explore.

6 Policy 7.5: Affordable Housing

- 6.1 We note in paragraphs 7.41 to 7.45 the uncertainties now surrounding the provision of affordable housing as a result of proposed changes to national policy through the Housing and Planning Bill and the NPPF's Planning Practice Guidance.
- 6.2 We have always emphasised our clients' willingness to include a good proportion of affordable housing in developing their Crow Green Lane site. Proposed Policy 7.5 is looking for a minimum of 35% affordable housing on sites of 11 or more dwellings. We would be prepared to explore with the Council the possibility of providing a higher level than the minimum requirement, provided that development of the whole site remains financially viable.

7 Summary

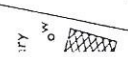
- 7.1 Sites that are readily available and make negligible contribution to the aims of the Green Belt, such as Site 159 at Pilgrims Hatch, should be considered for development early in the plan period. Such sites with relatively short development lead in times will relieve pressure on the Council's five year housing land supply, as required in the current National Planning Policy Framework.
- 7.2 If Site 159 is removed from the Green Belt, it will be wholly suitable, achievable and, as stated previously, readily available to satisfy both housing and community infrastructure needs of the area. No other site in and around Pilgrims Hatch can take all these matters on board.
- 7.3 This representation must be read in conjunction with all representations and correspondence to the previous Plan relating to Site 159 at Pilgrims Hatch. Any further more detailed information can be provided as required.
- 7.4 It is our clients' intention to present their case to the Inspector at the forthcoming Local Plan Examination, and we reserve the right to comment further during the local plan process.
- 7.5 We have made the offer to meet and discuss matters further. This still applies.

David Russell Associates
March 2016

Appendix A



Pilgrims' Hatch



Appendix B

SCHEDULE:

- PRIVATE:**
- Ⓟ 4 x 5Bed. Houses
 - Ⓟ 8 x 1Bed. Bungalows
 - Ⓟ 14 x 4Bed. Houses
 - Ⓟ 12 x 3Bed. Semi.
- AFFORDABLE:**
- Ⓟ 8 x 1Bed. Bungalows
 - Ⓟ 8 x 3Bed. Terraces
- 16 = 35% of 46 Units
 30 + 16 = 46 Units Total



EXACT BOUNDARY LINE TO BE AGREED & IDENTIFIED WITH DEEDS & OWNERS



Scale: 1:500 @ A2	Date: Nov 2009
Drawing no: 1707.06	
Title: Indicative layout - Scheme 2 Land off Crow Green Lane, Pilgrims Hatch, Brentwood Wiggins Gee Homes Ltd	
David Russell Associates planning and development consultants	
11 East Mount, Wheathampstead St Albans, Herts, AL4 6BJ	

SCHEDULE:

PRIVATE:

- (B) 12 x 3/4 BED. SEMI.
- (C) 10 x 4/5 BED. SEMI.
- (D) 14 x 4/5 BED. DETACH.
- (E) 2 x 3/4 BED. DETACH.
- (F) 8 x 2 BED. TERRACE

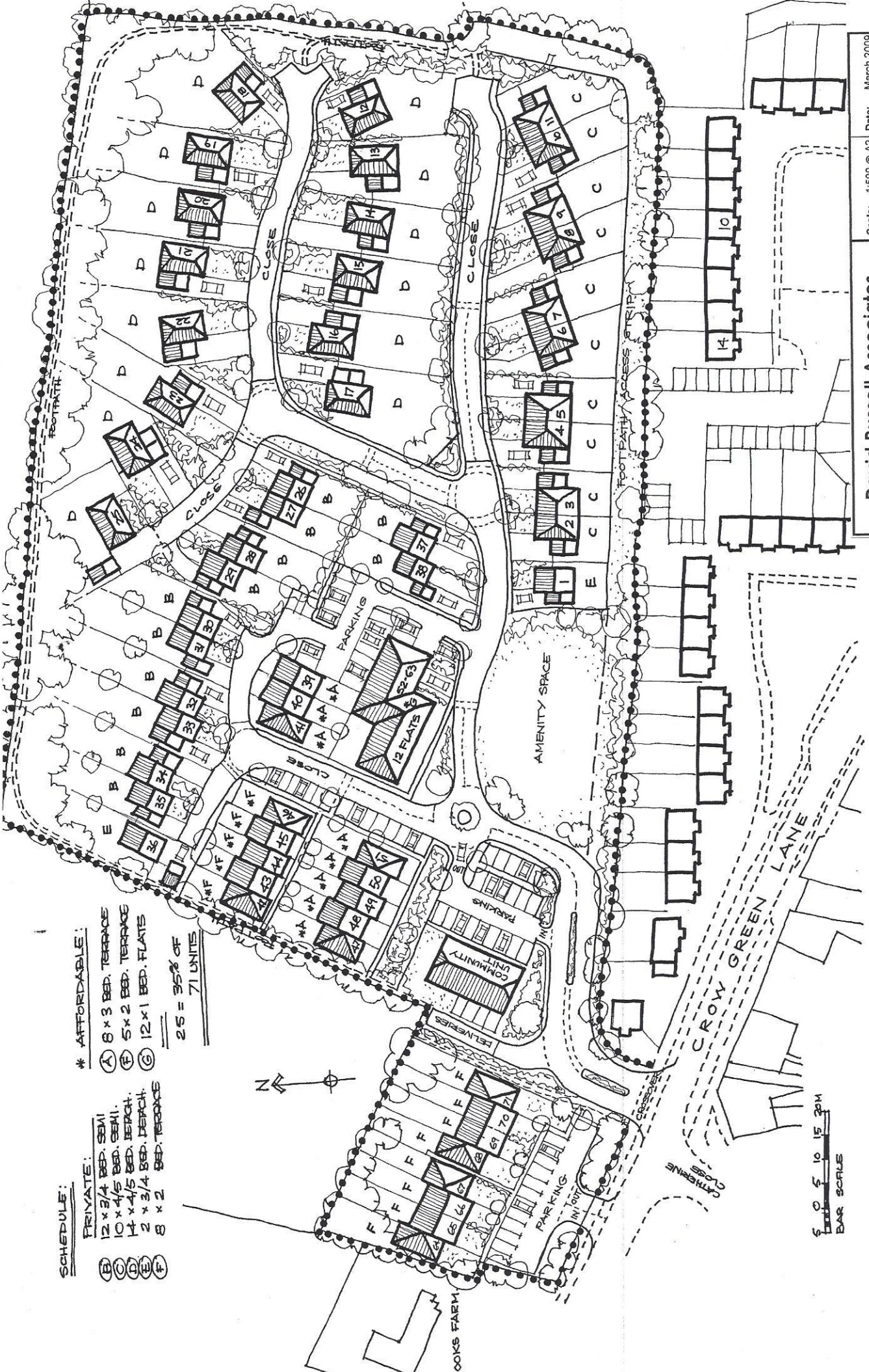
*** AFFORDABLE:**

- (A) 8 x 3 BED. TERRACE
- (E) 5 x 2 BED. TERRACE
- (G) 12 x 1 BED. FLATS

25 = 35% OF
71 UNITS

AFFORDABLE HOUSING:

- * 10% = 8 x 3 BED.
- * 5% = 5 x 2 BED.
- * 20% = 12 x 1 BED. FLATS
- 35% 25**



<p>David Russell Associates planning and development consultants</p> <p>11 East Mount, Wheathampstead St Albans, Herts. AL4 8BJ</p>	<p>Scale: 1:500 @ A2 Date: March 2009</p>
	<p>Drawing no: 1707.04</p>
<p>Title: Indicative layout - Scheme 3 Land off Crow Green Lane, Pilgrims Hatch, Brentwood Wiggins Gee Homes Ltd</p>	



Appendix C

Extract from David Russell Associates' representation to the Strategic Growth Options Consultation January 2015

“3 3: Sustainable Communities

Q3: Do you have any comments on the appropriateness of particular sites?

“3.1

“3.2 Site 159 is within the Green Belt, immediately next to the existing urban edge. It has wholly defensible boundaries, and is currently used as grassland. There is a mixture of paddocks and buildings to the west. Housing all the way along the site's southern boundary presents a raw urban edge to this part of Pilgrims Hatch.

“3.3 The Green Belt's main functions are:

- to check the 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
- to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

“3.4 The Council has already considered all possible urban land recycling within the Borough and concluded that there is still a requirement to find land in the Green Belt for some 3,000 homes. Our assessment of Site 159 against the other four Green Belt functions is:

- sprawl – the site has buildings on two sides and definitive boundaries on the others; contribution to preventing urban sprawl relatively small
- merging of towns – large rural area to the north; contribution to preventing merging of towns negligible
- countryside – buildings on two sides, with strong defensible boundaries to north and east; contribution to safeguarding countryside relatively small
- setting of town – the site is a narrow strip of land on the urban edge of Pilgrims Hatch. It makes a negligible difference to the setting of Brentwood as an historic market town.

Compared to many of the potential development sites shown within the A12 Corridor, allocating Site 159 would have relatively minor consequences for the function of the Green Belt in this part of the Borough. The site provides an ideal opportunity to make an early contribution to the Borough's identified housing needs and improve local community facilities. We have noted in past consultations the Council's identification of changes in local demographics, the most significant being a predicted continuing growth in the numbers of older people. Sites like 159 will provide opportunities for new facilities meeting the needs of older people on a relatively modest development close to the countryside. This would be a direct response to the Consultation Document's call, in paragraph 6.8, for new community facilities delivered alongside new housing.”