



**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

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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.

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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 5.1, Policy 5.2, Policy 6.1, Policy 6.2, Policy 7.1, Policy 7.4

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Consultation Response

**Brentwood Borough Council
Draft Local Plan**

On behalf of Catesby Estates Limited

March 2016



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1 INTRODUCTION

- 1.1 This representation on the Brentwood Draft Local Plan (DLP) 2016 is submitted by Strutt & Parker LLP on behalf of Catesby Estates Limited in relation to land at Wyatts Green Lane, Wyatts Green, Brentwood.
- 1.2 The application site has previously been promoted to Brentwood Borough Council in earlier rounds of the consultation on behalf of W.H. Norris and Sons. Catesby Estates Limited now has an agreement in place with the landowners to promote the land.
- 1.3 In the Brentwood Borough Council Strategic Housing Land Availability Assessment (SHLAA) (2011), it has a site reference GO29. For completeness a map showing the submitted site is provided as **Appendix 1** to this submission.
- 1.4 The site is on land currently allocated as Green Belt in the Brentwood Replacement Local Plan (2005), but is situated immediately adjacent to the settlement boundary of Wyatts Green. It benefits from a very good relationship with the development boundary of Wyatts Green. In Brentwood Borough Councils Strategic Housing Land Availability Assessment (SHLAA) (2011), the site has a reference of GO29.
- 1.5 For completeness a map showing the submitted site is provided in Appendix 1 of this submission.
- 1.6 The specifics of the site – and its sustainability for allocation for residential development – is addressed within Section 4 of this submission.
- 1.7 We have a number of concerns in respect of the proposed approach as set out in the DLP, and consider that a number of amendments are required in order for the plan to be considered to be sound. Our concerns are detailed within this submission. Areas to concern relate to high level matters, having regard to duty to cooperate, overall housing numbers and distribution of housing. Concern is also raised in relation to the approach taken to allocation of land in villages and in particular exclusion of land at Wyatt's Green Lane, Wyatt's Green from the development plan.

2 DUTY TO COOPERATE

- 2.1 We note the Council recognises the requirement to cooperate with other authorities under the Duty to Cooperate in the preparation of its Local Plan (paragraph 2.22 of the DMP).
- 2.2 We further note that the proposed strategy for delivering housing is heavily reliant on the development of Dunton Hill Garden Village. The suitability, sustainability and deliverability of such an approach is discussed further within Section 4 of this representation.
- 2.3 However, in relation to the Duty to Cooperate, we note that Dunton Hill Garden Village is a cross-boundary proposal that straddles the boundary between Brentwood and Basildon Boroughs. As such, it will require the support of both Brentwood Borough Council and Basildon Borough Council working together as the relevant Local Planning Authorities in order to be delivered.
- 2.4 To date, information published in respect of the Duty to Cooperate and how Brentwood Borough Council and Basildon Borough Council are working together on Dunton Hill Garden Village is limited. A Memorandum of Understanding was prepared between the authorities, committing to the preparation of a consultation document relating to the Dunton Hill Garden Village in November 2014. A Consultation Document – ‘Dunton Garden Suburb Consultation: Exploring the potential opportunities for cross boundary development’ – was subsequently published by both authorities, followed by a report into the consultation.
- 2.5 However, other than this exploratory consultation document, we are unable to find any published information that suggests the authorities have progressed plans and firmed up proposals. Given the significant extent of the reliance on the Dunton Garden Village by the DLP to deliver what the Council considers to be the Borough’s housing need, we would have expected details setting out a firm commitment by both authorities to the delivery of the project to be published alongside the DLP.
- 2.6 On the contrary, we note the following statement that was published by Basildon Borough Council in January 2016 alongside consultation on the Basildon Draft Local Plan consultation:

“In the period from January to March 2015, the Council and Brentwood Borough Council jointly consulted on a proposal known as Dunton Garden Suburb. This

was a proposal for a community comprising 4,000 to 6,000 new homes and associated employment provision and community facilities, straddling the boundary between the two boroughs.

“Having considered the outcomes of this consultation, the Basildon Draft Local Plan does not include proposals for Dunton Garden Suburb, as Brentwood Borough Council has not provided sufficient information, at this time, to show it is the best location for new housing provision in the Brentwood borough.”

2.7 Given this stance by Basildon Borough Council, we question how effectively the Duty to Cooperate has been met in respect of the DLP and Dunton Hills Garden Village in particular.

2.8 Cross-boundary issues relevant to Local Plan are not limited to the proposals in respect of Dunton Hills Garden Village. Brentwood is not an island and the DLP acknowledges the multitude of relationships between the Borough and surrounding areas.

2.9 This includes the strong relationship with London: the presence of the Brentwood within the London Arc, the connectivity between London and Brentwood, and the reliance of Brentwood’s population on London for employment (Figure 2.3, paragraphs 2.23, 2.34, 2.51, 5.64, 8.7, 8.22, 9.31 of the DLP).

2.10 The arrival of Crossrail is identified as one of the Borough’s key characteristics (Figure 2.4 of the DLP):

“The arrival of Crossrail at Brentwood and Shenfield will improve the existing metro service and provide new direct links through Central London. This could provide opportunities for development and investment, but also challenges for existing infrastructure capacity”.

2.11 It is clear that crossrail is anticipated to further strengthen the relationship between London and Brentwood. For example, the DLP states at paragraph 2.51:

“Crossrail will provide the Borough with an improved train service, increased capacity, station improvements and new direct links to Central London, Heathrow Airport and the West.”

- 2.12 Notwithstanding the above it is not clear to how Brentwood Borough Council have engaged with London Boroughs or the Mayor of London in the preparation of the DLP.
- 2.13 In addition the Borough has a strong connectivity and relationships with neighbouring Essex authorities. Figure 8.1, for example, depicts how well Brentwood is placed in terms of transport links to surrounding centres in Essex, (as well as London and Kent) and airports at Stansted and Southend.
- 2.14 Notwithstanding the above, and disconcertingly, there is reference within the DLP to Brentwood Borough being considered to constitute a self-contained housing market area (paragraph 5.36) – a stance that is contradicted by numerous references within the DLP to the strong relationships between Brentwood and surrounding areas. Further the plan appears to seek to solely meet the objectively assessed needs of Brentwood Borough, without consideration of any unmet needs of neighbouring authorities. It is not clear to what extent authorities with whom Brentwood Borough has a connection have been engaged and are agreeable to such an approach. This issue is particularly pertinent given the strong relationship between Brentwood and London, and the latter’s acute housing need. We question whether the approach currently being taken in the preparation of the Local Plan meets the Duty to Cooperate.

3 OBJECTIVELY ASSESSED HOUSING NEED

- 3.1 We note that the Council has determined the objectively assessed housing need for the Borough to be 362 dwellings per annum, informed by the Strategic Housing Market Assessment (2013) (SHMA) and Objectively Assessed Housing Needs for Brentwood (2014).
- 3.2 The figure of 362 dwellings per annum appears to have been informed by population projection analysis carried out by Edge Analytics for Brentwood, and cited in the SHMA.
- 3.3 The Objectively Assessed Housing Needs for Brentwood, however, also considers the delivery of 411 dwellings per annum as a feasible housing target for the Borough. It is not clear on what basis this level of growth has subsequently been rejected by the DLP.
- 3.4 In determining objectively assessed need the National Planning Practice Guidance (NPPG) (Paragraph: 019 Reference ID: 2a-019-20140306) is clear that market signals should be considered and the housing need number suggested by the household projections adjusted to reflect these. Further, the NPPF is clear that Local Plans should have regard to market signals. In the case of Brentwood Borough, and as acknowledged within the DLP itself, the Borough has among the most expensive housing in Essex, comparable to London house prices. This suggests the housing figure should be revised upwards from that suggested by household projections.
- 3.5 The NPPF (paragraph 47) is clear that Local Planning Authorities should seek to significantly boost the supply of housing.
- 3.6 In addition, the NPPF requires Local Plans to be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. It is not clear from the DLP how unmet needs in neighbouring areas have been considered. On the contrary, the DLP indicates at paragraph 5.36 that only housing needs within the Brentwood Borough boundary have been addressed. As noted earlier within this submission, the DLP recognises how well connected the Borough is with neighbouring areas and London. It follows that the Borough may be suitably placed to accommodate some of the unmet needs of such areas, and this should be explored through the Local Plan process if it is to avoid being unsound.

- 3.7 It is noted that strategic objectives of the DLP include to maintain high and stable levels of economic growth; and economic development is one of the overarching priorities set out in the Corporate Plan 'Vision for Brentwood' 2016-19. It should be recognised that housing development has intrinsic economic benefits. This includes employment relating directly to the construction of the development, and jobs relating to the supply chain. Housing development also engenders local economic benefits relating to additional local expenditure. It is important that the economic growth aspirations of the Local Plan and the housing growth policy support, rather than contradict, one another.
- 3.8 There are clearly factors that suggest the Brentwood Local Plan should seek to deliver a greater number of homes than proposed in the DLP. At the very least the provision of a greater number of dwellings is a reasonable option that should be explored. In this regard the plan in its current form is considered to be unsound.

4 HOUSING GROWTH STRATEGY

4.1 For the reasons set out within Section 3 of this representation, it is considered that the Brentwood Local Plan should seek to deliver a greater number of new homes than the DLP proposes. However, we would question the deliverability of even the reduced quantum based on the strategy currently proposed by the DLP. Of particular concern is the reliance placed on Dunton Hills Garden Village and on windfall to help meet housing needs. In addition concern is also raised in regard to the proposed distribution of growth within the Borough.

Reliance on Dunton Hills Garden Village

4.2 Dunton Hills Garden Village is relied upon to deliver 2,500 of Brentwood Borough's proposed housing target of 7,240 net additional dwellings between 2013 and 2033. This equates to over a third of the District's housing target. The District's strategy hinges on the deliverability of Dunton Hills Garden Village and as such there should be considerable certainty that it will come forward. However, the opposite is the case.

4.3 As noted within Section 2, the delivery of Dunton Hills Garden Village requires the support of Basildon Borough Council, yet they have recently published information to suggest their Local Plan will not support such a development.

4.4 Given the scale of Dunton Hills Garden Village, deliverability would likely be challenging even if there was support from all relevant Local Planning Authorities. The delivery of a development of the scale of Dunton Hills Garden Village would require collaborative working between a multitude of authorities, service / infrastructure providers, landowners and developers.

4.5 In addition to deliverability, the suitability and sustainability of Dunton Hills Garden Village is questionable. We note that the Dunton Garden Suburb Consultation documentation included a new train station between the existing stations of West Horndon and Laindon to serve the new development. The Dunton Garden Suburb Consultation Sustainability Appraisal makes references to the train station mitigating some of the potential negative impacts of Dunton Garden Suburb proposals. In terms of seeking to demonstrate the sustainability of Dunton Hills Garden Village, the provision of a train station is clearly a critical element. However the proposed new station is not included in the Network Rail Anglia Route Study Draft for Consultation (November 2014), which sets out the strategic vision for the future of the Anglia route network over the next 30 years. A new station would impact on service headways and so may reduce line capacity. An assessment would need to be undertaken on the impact of an extra stop close to two existing stations on journey

times and Essex Thameside line capacity, and would be subject to agreement from both National Rail and the rail operator c2c.

- 4.6 In addition, the Dunton Garden Suburb consultation documents are largely silent on the access strategy and potential mitigation measures necessary to accommodate development traffic on the existing local and strategic highway network.

Reliance on windfall

- 4.7 In addition to placing a significant reliance upon Dunton Hills Garden Village to meet housing targets, the DLP strategy relies on windfall to deliver 928 dwellings – 12% of the proposed total.
- 4.8 Despite the DLP's a relatively high degree of reliance on this potential source of housing development, the DLP states at paragraph 5.44 that the Council is keen not to be reliant on windfall.
- 4.9 It is stated at paragraph 5.43 that windfall will continue to contribute towards housing supply over the next 15 years. By definition, there is considerable uncertainty as to how much of a contribution windfall will be able to make towards delivery housing. It is far from clear that it will be able to make the level of contribution which the DLP assumes.
- 4.10 Having regard to the above, in the interests of ensuring greater certainty in respect of meeting housing targets, and mindful of the Government's requirement as per paragraph 47 of the NPPF for Local Planning Authorities to seek to significantly boost housing supply, windfall should be discounted from the housing trajectory within the Local Plan, or at the very least significantly reduced such that it is not relied upon in order to meet housing need.
- 4.11 One of the tests of soundness for the Local Plan, as per the NPPF, will be whether it is effective – whether the plan is deliverable over its period and is based on effective joint working on cross-boundary strategic priorities. If the Local Plan were to continue to place reliance on development of Dunton Hills Garden Village and windfall to meet development needs it would fail to be meet this test of soundness.
- 4.12 Figure 5.10 of the DLP shows that the current housing delivery rate is well below that required to meet what the Council consider to be the Borough's need. Furthermore, it is projected to remain below this level in the short-term. There is clearly a current, urgent housing need in the Borough. The DLP should not seek to rely on large strategic sites to deliver housing, as these cannot meet housing need in the short-

term and enable the Borough to retain a five-year housing land supply, as required by the NPPF (paragraph 47). To ensure the plan is capable of addressing the current urgent housing need and ensuring a five-year housing land supply a range of sites should be identified, including smaller sites that are deliverable in the short-term.

Settlement Hierarchy and Land adjacent to Wyatts Green Lane, Wyatts Green

- 4.13 We note that the Draft Local Plan sets out a proposed hierarchy of place to inform the spatial distribution of growth. This sets out that growth will be focused on the largest settlements around Brentwood Urban Area. Wyatts Green is currently defined as being within ‘settlement category 4: smaller villages’. Smaller villages are defined in the plan as follows:

‘Remote settlements with poor public transport, limited shops, jobs and community facilities. Development opportunities are limited, although as with larger villages brownfield redevelopment opportunities will be encouraged to meet the local needs where appropriate. No amendment is proposed to the Green Belt boundaries surrounding smaller villages.’

- 4.14 In relation to the proposed settlement hierarchy, it is considered that Wyatt’s Green should be considered as a ‘larger village’ rather than a ‘smaller village’ as stated at present. This is on the basis that it should be considered in conjunction with Doddinghurst, which is classified as a larger village and is only a short walk from Wyatt’s Green. The walk between Doddinghurst and Wyatt’s Green benefits from a wide pavement and is an easy walk for residents. Doddinghurst supports a church, village hall, junior school and a parade of shops including a pharmacist, newsagents, pubs and a post office. All of which are within a short walking distance of the application site. In addition Wyatts Green benefits from being on a bus route, which runs along Mill Lane and Church Lane, only a short walk from the application site.
- 4.15 It is therefore considered that Wyatt’s Green should be considered in the same settlement category as Doddinghurst. This approach is consistent with paragraph 55 of the NPPF, which states that in rural areas, development in one village may support services in a village nearby. This change is considered necessary in order for the plan to be considered to be sound.
- 4.16 The draft consultation sets out that the Councils approach is to make no amendments to the settlement boundaries for all larger and smaller villages. This approach is contested. Paragraph 55 of the NPPF states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. In addition paragraph 54 states that local planning authorities should be responsive to local circumstances and plan housing to

reflect local needs. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.

4.17 It is considered that housing growth at an appropriate scale would help meet the local housing needs of Doddinghurst, Wyatt's Green and Hook End. It is therefore considered that the Borough Council needs to revisit its approach to the distribution of housing, with provision for a proportion of the Borough's housing needs to be made up of growth from smaller settlements and villages.

4.18 In this regard it is considered that land adjacent to Wyatts Green Lane, Wyatts Green is a sustainable, suitable and deliverable site to come forward and meet this need. The site benefits from a number of attributes, which render it a suitable site for allocation as part of the Local Plan process:

- The site is adjacent to the settlement boundary and presents a logical extension to the village of Wyatt's Green.
- The site is under the sole control of Catesby Estates Limited and they are committed to the early delivery of housing on the application site.
- An initial site constraints and opportunities plan of the application site has been developed. It is proposed to limit the built development to the west side of the site in order to minimise the impact on the Green Belt. This could include the provision for landscape buffer planting if required by the Council. By maintaining the built form of the development in this area, it would provide for a logical expansion of the settlement boundary, in line with the dwellings located to the south of the site.
- The site can be delivered without compromising the 5 purposes of the Green Belt as set out in paragraph 80 of the NPPF. This is set out in further detail within paragraph 4.26 below.
- The residential parcel is an area of 1.85 hectares in size and could deliver up to 55 dwellings on the site. There is some flexibility on the number of dwellings to be delivered and the applicants are happy to have further discussions with the Council in this regard.
- The proposals could deliver a number of benefits. This includes the provision for a high quality area of public open space, towards the east side of the site, covering an area of 2.68 hectares. This could include the provision of a new public right of way across the site.

- Direct access can be obtained from the application site onto the public highway.

Selection of Sites

- 4.19 We note that sites have been selected based on a “sequential approach to sustainable land use” (paragraph 7.29 of the DLP). This appears to result in any site within an existing settlement boundary being automatically considered more sustainable than brownfield sites in the Green Belt, which in turn are considered inherently more sustainable than any greenfield site in the Green Belt. We question the soundness of such a simplistic approach to the consideration of sustainability, and whether this approach will result in the most sustainable strategy when considered against the reasonable alternatives. Furthermore, it is unclear whether a Green Belt review has been undertaken prior to this filtering process to determine whether all land currently allocated as such meets the purposes of including land in the Green Belt, as set out in the NPPF.
- 4.20 Five Greenfield, Green Belt sites are proposed for allocation for housing development in the DLP. The justification for the identification of the five greenfield Green Belt sites is unclear, as is the justification for the rejection of land adjacent to Wyatts Green Lane, Wyatts Green.
- 4.21 The NPPF states that the purposes of including land in the Green Belt are as follows:
- 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.
- 4.22 In this regard, it is considered that land at Wyatt’s Green Lane, Wyatts Green can be developed without compromising the five objectives of the Green Belt as set out above. This was acknowledged in the Strategic Housing Land Availability Assessment (SHLAA) that was completed.
- 4.23 There is reference at paragraph 7.28 of the DLP to the Strategic Housing Land Availability Assessment (SHLAA) being the starting point for considering sites as part of the plan making process.

4.24 In terms of site reference GO29 and its assessment in the SHLAA 2011, the SHLAA 2011 found the site GO29 to be suitable, available and achievable. Of particular relevance is the acknowledgement that land adjacent to Wyatt's Green could be developed with minimal impact on the Green Belt. The SHLAA states the following in relation to the suitability of the site:

'The site comprises agricultural land. This would be suitable for development as it would follow the existing build line and would form a logical boundary to the Wyatt's Green settlement. The site lies adjacent to the settlement boundary. The development of this site would not lead to settlement coalescence and it would not encroach any further into the countryside. The impact upon the open countryside is therefore considered to be minimal.'

4.25 It is therefore clear that Brentwood BC own background document acknowledges that this site is a very good site for development. It is not clear from the consultation document why this site has been overlooked and therefore the plan is considered to be unsound in this regard.

4.26 To expand on the above, the application site is assessed against the 5 purposes of the Green Belt as follows:

1. To check the unrestricted sprawl of built up areas

As set out within the SHLAA, the application site benefits from being very well enclosed and represents a logical extension to the settlement boundary. It is adjoined by residential properties to both the south and west. In addition the dwellings on Warren Lane to the north, project further east than the application site. An area of public open space and landscape planting is proposed to the east boundary of the site, to restrict any urban sprawl into the countryside.

2. To prevent neighbouring towns merging into one another

The delivery of housing on this site will not result in any form of coalescence with nearby settlements. Being located to the east side of Wyatt's Green, the application site is several miles from Ingatestone and Mountnessing to the east. There will be no impact in terms of coalescence in this regard.

3. To assist in safeguarding the countryside from encroachment

As set out under bullet point 1 above, it is proposed to have an area of public open space and landscape planting along the east boundary of the application site. As a result there will be no encroachment on the wider countryside as a result of the proposed development.

4. **To preserve the setting and special character of historic towns**

The application site is not situated within an historic area and the delivery of the application site will have no impact upon any listed buildings or the setting of any historic features.

5. **To assist in urban generation, by encouraging the recycling of derelict and other urban land.**

There is insufficient brownfield or other urban land available within the Borough in order to meet the required housing needs of the area. In addition there are no suitable sites within the development boundary for Doddinghurst and Wyatt's Green. In this regard it is considered that there is a need to release suitable sites within the Green Belt for development as part of the Local Plan process.

4.27 In addition allocation of land at Wyatt's Green Lane, Wyatts Green, would be consistent with the three principles of sustainable development, as set out within the NPPF. The compatibility of this site against the three objectives is set out as follows:

Economic

4.28 In terms of economic impact, there is an inherent link between providing homes and the creation of jobs. It would provide much need rural housing for the residents of Wyatt's Green, Doddinghurst and Hook End. In addition during the construction period it would create a significant number of new jobs.

Environmental

4.29 The site consists of an arable field of low ecological value. As set out in the SHLAA the Council acknowledges that this site could be delivered without any major impact upon the wider objectives of the Green Belt. In addition the proposed significant area of public open space, has the potential to offer substantial benefits to the scheme.

Social

4.30 In relation to social impacts, the proposals will deliver much needed affordable housing and market housing. The affordable housing will be of significant benefit to meet the needs of local residents in the local area.

4.31 In summary, the site – as set out in previous representations – is sustainable and deliverable. Furthermore, it would not undermine the purposes of including land in the Green Belt, and its allocation for development would result in the creation of a new robust, defensible Green Belt boundary for this location. As such it is a suitable site capable of helping to meet housing need in the short-term. It is not clear from the DLP or its supporting documentation how information submitted to the Council since the publication of the SHLAA has been considered, and why land adjacent to Wyatts Green Lane, Wyatts Green has not been identified for development in the DLP.

5 SUSTAINABILITY APPRAISAL

- 5.1 The Sustainability Appraisal (SA) plays an important role in the plan-making process. It should be used to identify and consider all reasonable alternatives at an early stage in the plan making process, and should inform the local planning authority in choosing its preferred approach.
- 5.2 It is imperative that the SA considers all reasonable alternatives. We would draw the Council's attention to judgments in respect of *Heard v Broadland District Council*, *South Norfolk District Council*, *Norwich City Council* [2012] and *Save Historic Newmarket Ltd v. Forest Heath District Council* [2011]. The judgments in these cases confirm *inter alia* the need for the public to be presented with an accurate picture of the reasonable alternatives at an early stage; for these alternatives to be subject to appraisal; and for reasons for their rejection / selection to be explained within the Environmental Report.
- 5.3 We have concerns with the current approach to SA in respect of both how the proposed total housing figure has been considered.
- 5.4 In respect of the total housing target for inclusion in the Local Plan, we note the Interim SA published alongside the DLP assumes the Local Plan will plan for the delivery of 7,240 new homes over the plan period (2013 - 2033). As set out within this representation, the provision of a greater number of new homes is clearly a reasonable alternative that merits consideration. However, there appears to be no assessment of the sustainability of a higher level of growth.

6 OVERVIEW AND CONCLUSION

6.1 As set out within this representation, there are concerns with the current direction being taken in respect of the Brentwood Local Plan. If the Local Plan were to proceed along the lines of the DLP it is considered unlikely to be found sound.

6.2 However, there are still opportunities for the Local Plan to be made sound. The following provides a summary of the suggested amendments to be made to the next iteration of the plan to achieve this:

- Review the current proposed number of homes to be provided 2013-2033 having regard to market signals and unmet housing need within areas with which the Borough is connected, to be determined through further working under the Duty to Cooperate with relevant Authorities.
- Ensure that the Local Plan does not rely on the delivery of Dunton Garden Hills Village or windfall to meet housing needs, due to considerable uncertainty regarding their potential to deliver housing.
- Reduce reliance on large strategic sites that will not be delivered in the short-term, and seek to address the current, urgent housing need through the identification of a range of smaller, deliverable sites in sustainable locations; and ensure the provision of a five-year housing land supply.
- Apply a more sophisticated and transparent approach to site selection (and Sustainability Appraisal of potential sites) that considers the sustainability and deliverability of sites, along with their potential to relate to a spatial strategy for development linked to the settlement hierarchy.
- Allow for a more even distribution of development within the Borough, to include the provision of delivery of housing within villages, in order to help meet the housing needs of more rural settlements. In particular sustainable villages such as Wyatts Green and Doddinghurst, should be allocated for an appropriate scale of development.
- Amendment to the settlement hierarchy to include Wyatt's Green as part of Doddinghurst, as a larger village within the plan. This approach is consistent with the NPPF.

6.3 It is submitted that land adjacent to Wyatts Green Lane, Wyatts Green should be allocated for residential development as part of a sound Brentwood Local Plan. As set out in this representation, it is considered a sustainable, suitable and deliverable site that would help meet the current, urgent housing need in the Borough and contribute to a sustainable pattern of growth. This is reflected within the Council's own assessment of the site as part of the SHLAA process, which is clear that the site can be developed without compromising the objectives of the Green Belt.

Appendix A: Location Plan

Wyatts Green- Location Plan

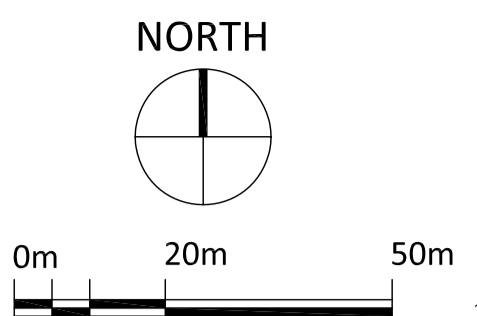


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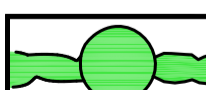

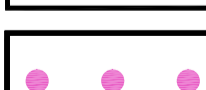

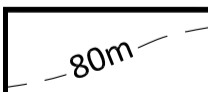
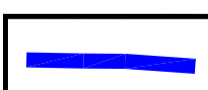



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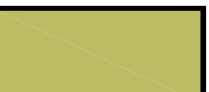
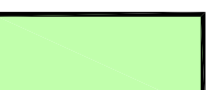
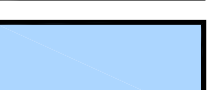


Appendix B: Site Opportunities and Constraints Plan



CONSTRAINTS:-

-  SITE BOUNDARY
GROSS AREA = 4.53 ha (11.19 acres)
-  PORTION OF LAND WHERE ADVERSE POSSESSION HAS BEEN APPLIED FOR
-  EXISTING TREES AND HEDGEROWS ON /ADJACENT SITE PLOTTED FROM DESKTOP REVIEW - SUBJECT TO TOPO SURVEY
-  EXISTING PUBLIC RIGHT OF WAY (PRoW)
-  EXISTING WALKED FOOTPATH (NONE PRoW)
-  RESPECT AMENITY OF EXISTING PROPERTIES NEAR TO THE SITE
-  APPROXIMATE CONTOURS
-  EXISTING DITCH COURSE
-  EXISTING FOUL WATER SEWER

OPPORTUNITIES:-

-  PRINCIPLE SITE ACCESS - ALL MODES
-  INDICATED NDA = 1.85 ha (4.57 acres)
POTENTIAL SITE CAPACITY @ 30 D.P.H. = 55 DWELLINGS APPROXIMATE
-  INDICATIVE QUANTUM OF GREEN SPACE: 2.68 ha (6.62 acres)
-  POTENTIAL PRIMARY SuDS FEATURE: ATTENUATION POND - 1200m³
-  ENHANCE EXISTING FIELD BOUNDARY WITH NEW TREE/HEDGE PLANTING TO CONTAIN EASTERLY VIEWS TO/FROM DEVELOPMENT
-  DEVELOPMENT STAND-OFF FROM EXISTING DITCH COURSE



Project Name: **WYATT'S GREEN LANE
WYATT'S GREEN
BRENTWOOD, ESSEX**

Drawing Title: **INITIAL SITE CONSTRAINTS
AND OPPORTUNITIES**

Revisions:	Scale: 1/1000	Media: A2P	Drawn: LA	Checked: -	Day/Month/Year: 22/10/2015
Project No.:	-			Drawing No.: DC/001B	