

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

Date 21st March 2016
Ref

Dear Sir,

REPRESENTATIONS TO THE DRAFT BRENTWOOD LOCAL PLAN ON BEHALF OF STONDON MASSEY EXPORT AND SCRAP YARD

Please find enclosed an objection to the emerging Brentwood Local Plan on behalf on my client Stondon Massey Export and Scrap Yard. These representations seek the recognition of my client's site as a brownfield site in the Green Belt that is suitable for housing. It is our case that brownfield sites in the Green Belt should be allocated for housing ahead of releasing greenfield greenbelt sites in other locations, particularly given the Government's proposed change with regard to the NPPF and the test of 'openness'.

Background

With a Borough that is 89% Green Belt and a desperate need for new housing (7,240 over the plan period), the emerging Brentwood Local Plan acknowledges that Green Belt releases are required. The emerging Local Plan, diagram 5.4 sets a sequential approach to releasing Green Belt sites favouring brownfield sites in the Green Belt that are close to existing settlements and transport corridors, then strategic sites large enough to self-sustain new services, followed by greenfield Green Belt urban extensions. The diagram does not adequately address large brownfield Green Belt sites; these are all left to be considered as potential windfall sites.

Paragraph 5.43 of the emerging Local Plan describes windfall sites as those which are usually previously developed sites which come forward unexpectedly as they are not allocated and usually provide fewer than 10 new dwellings.

The NPPF provides a clear policy approach to developing brownfield sites within the Green Belt. Paragraph 8.9 identifies that exceptions to 'inappropriate development' Green Belt policy include "the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development."

The Government recognises the potential that brownfield sites within the Green Belt could offer for housing development. In December 2015 the Government consulted on changes to the NPPF suggesting that only 0.1% of land in the Green Belt is brownfield and suitable for housing. The Autumn Statement 2015 set out that the Government will bring forward proposals to amend national planning policy to allow for the development of brownfield land in the Green Belt providing it contributes to starter homes. The Government proposes to change policy to support the regeneration of previously developed brownfield sites in the Green Belt by allowing them to be developed in the same way as other brownfield land, providing this contributes to the delivery of starter homes, and subject to local consultation.

It is therefore clear that, in principle, the Government is supportive of the principle of the consideration of large scale brownfield sites in the Green Belt to provide new homes.

The Site

These representations concern a 3.2 hectare site on the outskirts of Stondon Massey shown edged in red on the attached plans. The site is currently brownfield land in the Green Belt and operates as a Kennels and also a scrap yard with significant amounts of built floorspace across the site and large areas of external storage. Photos of the site are attached to this representation. The site is a heavily used, heavily trafficked site and is an eyesore in the Green Belt. The site has established use over a period of 20 years and is characterised by a range of buildings, storage containers, contained scrap and other industrial and storage processes across the site.



The Council's Green Belt Assessment of the site (site 104) assessed a larger site of 8.3 ha and identifies that the site currently has a low visual amenity, low tranquillity and is a mix of uses. The assessment finds that the site is not contained as the site lies away from the village of Stondon Massey and has no defined boundaries. We object to this description as the boundaries of the site are the current industrial and storage uses which are clearly defined. Whilst separate from the settlement of Stondon Massey it is within easy reach and currently provides a heavily used industrial/sui generis site. The Green Belt Assessment accepts that development of the site would not cause surrounding towns to coalesce. Substantive new housing development on this site needs to be weighed and balanced against the current substantive employment use in the countryside and the current impact that this currently has on HGV movements and visual impact in the Green Belt and the current need for new housing.

The assessment recognises that the uses across the site include significant buildings, hardstanding and also some pasture.

Precedent

Very close parallels can be drawn between the subject site and Thorby Priory (Brentwood Site reference 18) which was given a resolution to grant planning permission in July 2015. The Council's Green Belt Assessment of the Thorby Priory is almost identical to the assessment of my client's site. It is important to note that:

1. The Thorby Priory site is divorced from its nearest urban area and entirely within the Green Belt;
2. The site was considered acceptable when weighing the need to make the best use of land in light of housing needs and the lack of five year housing supply against Green Belt impact;
3. The site contained a number of commercial uses as well as areas of hardstanding for the storage of cars, car parts and lorry containers;

The officer's report to committee identified that inter alia the main issues relate to the principle of the development (including loss of employment land) the impact of the development on the openness of the Green Belt and the purposes of including land within it and the impact of the development on the character and appearance of the area.

In principle the officer's report to Committee identifies that the NPPF excludes the re-development of previously developed sites in the Green Belt from inappropriate development but only where the development would not have a greater impact on the openness of the Green Belt and the purpose of including land within it. It was accepted that the resulting development would be relatively isolated and require residents to use private cars however it was accepted that the current uses generate a significant amount of traffic.

It was considered acceptable that the test of openness across the site be considered with regard to the existing buildings on the site in addition to the areas of hard standing and external storage.

Conclusions

In conclusion, the Stondon Massey Scrap Yard site should be identified within the emerging Local Plan as a significant brownfield site suitable for housing. As a large brownfield site within the Green Belt the site is acceptable for housing provided that the proposed development does not have any greater impact on the openness of the Green Belt. Whether the test of 'openness' is ultimately removed by the Government remains to be seen, but in any event, Brentwood Borough Council should recognise and assess the housing potential of the site within the emerging Local Plan.

The site is over 3ha and is too large to be left to be treated as a windfall site. The potential housing that could be accommodated should be assessed at the Local Plan stage so that it can be assessed whether other greenfield Green Belt sites are required for release.

The Stondon Massey Scrap Yard site is very similar to the Thorby Priory site which is considered by the Council to be suitable for residential development. My client wishes to work with the Council to take a plan-led approach to meeting the identified housing need within the Borough. In this regard these representations strongly object to the fact that brownfield greenbelt sites are not fully assessed and considered as part of the housing delivery sequential approach. Brownfield Green Belt sites should be considered higher in the housing delivery hierarchy and not left to be considered as windfall sites, particularly where the sites are over 1ha.

Representations

These representations seek the inclusion and recognition of the Stondon Massey Export and Scrap Yard Site and adjacent Kennels as a major brownfield site within the Green Belt suitable for housing and mixed use employment. In accordance with



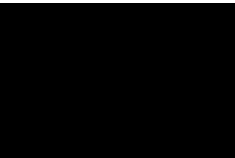
the NPPF, as a brownfield site, development would not be inappropriate where the impact on the openness of the Green Belt is no greater than the current uses.

Given the size of the site the Local Plan should address the site and identify the potential housing that could be achieved. It is not appropriate to just leave the site to be addressed as a windfall site as the residential capacity of the site is much greater than 10 units. If improvements are needed to increase the site's sustainability for example with regard to access to local services or sustainable modes of transport, this should also be considered at this stage.

It is therefore proposed that the site is allocated within the emerging Local Plan as a brownfield site that is currently intensively used for industrial and commercial uses but which could have potential for housing or employment over the Local Plan period.

We look forward to discussing this site with you further.

Yours sincerely,



Holly Mitchell
Director

Encs.



**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

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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):

Please see attached letter:
Paragraph 5.16 – Approach to sequential
Paragraph 5.43
Paragraph 7.4
Policy 9.9
Policy 9.12
Proposals Map

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 attached letter

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**



Photograph 1



Photograph 2



Photograph 3



Photograph 4



Photograph 5



Photograph 6



Photograph 7



Photograph 8



Photograph 9



Photograph 10