

# **REPRESENTATIONS TO BRENTWOOD DRAFT LOCAL PLAN: PREFERRED SITE ALLOCATIONS CONSULTATION**

## **LAND AT HERON COURT, HERONGATE**

**ON BEHALF OF MARTIN GRANT HOMES**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

## **Pegasus Group**

Suite 4 | Pioneer House | Vision Park | Histon | Cambridgeshire | CB24 9NL

**T** 01223 202100 **F** 01223 237202 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

---

## CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	HOUSING PROVISION	2
	OAN & Duty -to -Co-operate	2
	Over-Reliance on Dunton Hills Garden Village	2
	Smaller allocations	4
	Windfall	4
	Standardised methodology	5
	Five-year Land Supply	5
3.	LAND AT HERONGATE, BRENTWOOD	6
	Sustainability of the Site	6
	Sustainable Transport	8
	Designations	9
4.	SUMMARY	10

### **Appendix 1: Site Location Plan**

### **Appendix 2: Concept Plan**

### **Appendix 3: Facilities Plan**

---

## 1. INTRODUCTION

- 1.1 These representations are submitted in response to Brentwood Borough Council's Draft Local Plan Site Allocations Consultation (February 2018). They are submitted on behalf of Martin Grant Homes who have land interests in Herongate, located between Heron Court and Billericay Road. A site location plan is attached in Appendix 1.
- 1.2 These representations follow comments to earlier consultations, specifically the Pre-Submission Consultation in March 2016, the Strategic Growth Options consultation in February 2015 and the Preferred Options consultation in July 2013. All previous representations should be read in conjunction with these latest representations. Together the representations demonstrate the ongoing support Martin Grant Homes has for this sustainable site to deliver necessary housing within the early part of the Plan period.
- 1.3 To support these representations, an indicative concept plan has been produced which demonstrates how the site at Herongate could be developed for a modest housing scheme in keeping with the surrounding area (Appendix 2).

## 2. HOUSING PROVISION

### OAN & Duty -to -Co-operate

- 2.1 It is encouraging that the Council is planning to deliver its full Objectively-Assessed Need (OAN) within the Borough and is planning for housing numbers slightly above the 380 dwellings per annum figure to create flexibility and contingency should some housing sites fail to come forward. However, this is a challenging target especially in view of the historical building rates in the Borough. From 2013-2017, the Borough obtained an average housing completion rate of circa 132 dwellings per annum. It is not clear from the housing strategy, how the Borough plan to triple this building rate.
- 2.2 There is limited mention of any ability to meet neighbouring authorities unmet need. There appears to be a good relationship between Essex planning authorities. However, certain authorities such as Castle Point have intimated that they will be unable to meet their housing needs due to the restrictions of Green Belt within their authority. Also, other authorities may have underestimated their housing needs especially in view of the standardised methodology approach that is soon to be introduced. Therefore, there may be a significant shortfall in housing delivery which will impact all authorities and a flexible approach to housing supply is required in order to address this unmet need.

### Over-Reliance on Dunton Hills Garden Village

- 2.3 A further concern is the over-reliance on the delivery of housing at Dunton Hills Garden Village. It is anticipated that 2,500 houses will be delivered at Dunton Hills within the Plan period equating to approximately 40% of the total new allocations identified in the Local Plan (6154). This is optimistic considering the current position of this proposal. It is important to consider whether planned development sites are capable of being delivered as soon as the Council envisages. In the case of Dunton Hills, it will be necessary to:
- Masterplan the site and adopt an SPD;
  - Continually engage with local stakeholders;
  - Secure outline planning permission;
  - Successfully negotiate and sign the Section 106 agreements;
  - Undertake any necessary land transactions;

- Submit Reserved Matters applications on individual development parcels; and
- Discharge all pre-commencement conditions.

2.4 These processes can be lengthy and are susceptible to delay. Developments of this size have the potential to build around 250 dwellings per year once at full building capacity. Therefore, it would take over 10 years for the development to provide 2,500 dwellings once construction is fully up to speed. All the above stages need to be completed by 2022, which is only 3 years from the anticipated date of adoption of the Local Plan (mid-2019) to ensure that the site delivers 2,500 dwellings by 2032. This is unrealistic and the site is unlikely to deliver all the anticipated housing within the Plan period.

2.5 Basildon Council will be publishing their Local Plan for consultation shortly but at this time, it is not clear as to their position in relation to the proposed Dunton Hills Garden Suburb. Previously they had objected to the inclusion of the site within Brentwood's Local plan.

2.6 The uncertainty surrounding the extent of the future Garden Village proposal and whether this will include Basildon Council creates uncertainty in the deliverability of the site within the Plan period. Joint working will need to be undertaken between the two authorities to identify the parameters of any future development before any confidence can be had. The consequences of Basildon Council deciding not to include the site as an allocation in their previous Plan needs to be understood. The Dunton Hills Garden Village was originally identified for between 4,000-6,000 residential units. However, without working jointly with Basildon, the allocation in the Brentwood Draft Plan is for 2,500 units, and the implications of reducing the size of the allocation could result in an inability to provide the self-sufficient and sustainable community envisaged in the Brentwood Draft Plan. The process of two authorities working together is complex and naturally leads to delays in the process, as is already being demonstrated.

2.7 It has not been possible to review a recent Brentwood Council housing trajectory that includes Dunton Hills Garden Suburb and therefore there is no identification in the Plan of when the site is expected to deliver. As explained previously, in order to deliver the full quantum of development on site (2,500 dwellings) within the plan period, development would need to commence on site by 2022. This is unrealistic.

- 2.8 The Council needs to identify additional smaller less-complex sites which will deliver in the early phase of the Local Plan to make up the shortfall that will potentially occur if there are delays in the delivery of Dunton Hills.

### **Smaller allocations**

- 2.9 Paragraph 66 of the NPPF discusses the benefits of housing allocations in sustainable villages. These provide a valuable role in enhancing the housing mix, introducing new affordable housing and help to support local shops and services. The Local Plan recognises that these smaller greenfield sites have the possibility of being built out quickly which will support housing delivery within the early stages of the Plan. It is acknowledged that these Green Belt sites must have defensible edges and that the revised village envelopes will be retained for the lifespan of the Local Plan.

### **Windfall**

- 2.10 There are no alternatives provided in the Plan to accommodate the non-delivery of any sites and therefore the Plan is restrictive in its approach. There is also a reliance on windfall sites in the Draft Plan with an allowance of 507 dwellings, equating to 6.14% of the total housing growth over the Plan period. There is no certainty that sites will come forward during the Plan period to fulfil this windfall allowance. This heavy reliance on windfall sites adds to the concern that the Borough may encounter difficulties in delivering the required housing. It is considered that the windfall allowance in the Plan is overly optimistic (especially with the high level of Green Belt land) and therefore the reliance on windfall should be reduced and instead additional appropriate and deliverable sites be released from the Green Belt to provide a more robust approach to meeting the Borough's identified housing need.
- 2.11 The Borough is not meeting its current windfall allowance, demonstrated by the current shortfall in housing delivery. The Council has a current housing land supply of only around 2.67 years. Therefore, it is considered unrealistic to expect such high windfall allowance during the Plan period and the Council is urged to review this.

### **Standardised methodology**

- 2.12 A further issue is the potential impact of the standardised methodology of calculating housing need which will be introduced by the Government shortly. The Local Plan discusses this impact in paragraph 43 and states that the initial consultation on the standardised methodology calculated Brentwood's annualised housing need as 454 dwellings. This would result in an additional 74 dwellings per year above the emerging Local Plan target. By planning for housing numbers slightly above 380 dwellings per year (the emerging Local Plan annualised requirement), this will not provide the additional 74 dwellings per year required when the standardised methodology is adopted. It is short-sighted of the Borough not to plan for this increase at this stage to ensure that the housing strategy is flexible enough to accommodate these future changing needs.
- 2.13 The recent NPPF consultation issued on 5 March 2018 clearly states in paragraph 61 that in determining the minimum number of houses needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. There is some uncertainty as to when the standard methodology will come into practice and the transitional arrangements for Local Plans. However, the revised NPPF is a material consideration as set out in Annexe 1 and therefore it is considered that the Council should be planning for this higher housing provision at this stage in order to alleviate the need for an immediate review of the Local Plan upon adoption.

### **Five-year Land Supply**

- 2.14 The latest statement on housing land supply published in November 2016 calculates that the Borough can demonstrate a housing land supply of only 2.67 years. This includes a 5% buffer. However, if a 20% buffer is included for persistent under delivery, the land supply position decreases to 2.33 years. It is clear that Brentwood Borough has persistently under delivered since 2013 (Table 1 in the report) and therefore a 20% buffer should apply. Regardless of the agreed size of the buffer, it is clear that Brentwood Council cannot demonstrate a five years supply of housing land and therefore the Council should be identifying adequate land within the Local Plan to address this shortfall. By relying heavily on one strategic site to meet 40% of the housing need will not fix this under supply in the short term. The Council needs to update its housing land position and include a housing trajectory in order to demonstrate which sites can meet their need in the immediate term.

### **3. LAND AT HERONGATE, BRENTWOOD**

- 3.1 There are concerns with the robustness of the approach taken in the Draft Plan to meeting the identified housing need in the Borough. The Plan must be realistic and provide confidence that sites will be delivered. Our client's site will provide a small modest sustainable development of approximately 5 dwellings that can be delivered in the short-term and would assist in addressing the Borough's lack of a five-year housing land supply as identified above and assist in delivering their housing provision during the plan period.
- 3.2 The site adheres to the Draft Plan's own requirements for considering appropriate and sustainable locations within the Green Belt. Our client's site would provide a development proportionate to the existing large village of Herongate. The site is well located to existing transport corridors and benefits from an existing good and regular public transport network.
- 3.3 There are also clear defensible boundaries to the site and development of the site would provide new defensible boundaries, as required by paragraph 66 in the Draft Local Plan. To the north is existing, residential dwellings with Billericay Road beyond. To the west is the residential units of Heron Chase and there are also existing residential units to the south. To the east of the developable area is existing mature woodland and it is proposed that pedestrian access to this woodland area could be provided as part of the development proposals for the site. The site would therefore provide a modest and appropriate infill development in this location. Release of this part of the Green Belt would therefore be appropriate.
- 3.4 The appropriateness of the site for the development proposed is demonstrated through the high sustainability characteristics of the site which are summarised below. There are also no complex ownership requirements with the site that could impact on the site's delivery.

#### **Sustainability of the Site**

- 3.5 The attached illustrative concept plan shows how our client's site in Herongate could be appropriately developed. This demonstrates that the site could be developed for a modest residential proposal in keeping with the surrounding



character, whilst retaining existing mature trees and vegetation. Adequate land has been included for the provision of public open space and sustainable urban drainage systems (SUDS).

- 3.6 Herongate is located approximately 2.5 miles to the south of Brentwood and is considered to be a sustainable Larger Village with a range of services and facilities of its own as well as being in close proximity and easy access to a wider range of services and facilities. The table below provides a summary of the services and facilities in Herongate within a mile of the site, and their distances from the site via existing routes, all of which are within walking distance.

Facility	Address	Distance from site
<b>Nursery and Infants School</b>	Tiddles Child Care 168 Brentwood Road, Herongate	0.3 miles
<b>Primary School</b>	Ingrave Johnstone C of E Aided Primary School, Brentwood Road, Ingrave	0.6 miles
<b>Football Club</b>	Herongate Football Club	0.3 miles
<b>Cricket Club</b>	Ingrave Cricket Club The Cricket Common, Brentwood Road	0.4 miles
<b>Golf Club</b>	South Essex Golf Centre	0.9 miles
<b>Country Park</b>	Thorndon Country Park South	1 mile
<b>Convenience Store</b>	Herongate Village Stores and Post Office 156 Brentwood Road	0.3 miles
<b>Other Shops</b>	Herongate Cycles The Old Stockyard, Cricketers Lane	0.2 miles
	The Final Touch Oak and Pine The Old Stockyard, Cricketers Lane	0.2 miles
<b>Petrol Station</b>	BP Garage & M&S Food 130 Brentwood Road	0.2 miles
<b>Public House</b>	Boars Head, Billericay Road	190 ft
	Green Man, 11 Cricketers Lane	0.2 miles
<b>Place of Worship</b>	Saint Andrews Methodist Church, Billericay Road	0.1 miles
<b>Hairdressers</b>	Studio One 8 Meadows Close, Ingrave	0.9 miles
<b>Industrial Estate</b> (including diverse range of companies such as printers, fencing, van hire and food catering)	Cockridden Farm Industrial Estate, Brentwood Road	0.6 miles

- 3.7 The table demonstrates that there are a wide range of services and facilities available in Herongate and this further improves the sustainability of our client's site. As well as being a sustainable village in its own right, Herongate is also in close proximity to Brentwood (3 miles to town centre), Billericay (4.5 miles to town centre) and Basildon (6 miles to town centre). There are a considerable number of services and facilities available in these towns, which can be accessed via public transport.
- 3.8 A facilities map is attached in Appendix 3, which clearly shows the close location of these services and public transport links to the site, demonstrating the site's sustainability.

### **Sustainable Transport**

- 3.9 The site is well located being close to existing bus links. The closest existing bus stop is located 0.2 miles (5-minute walk) to the north of the site on Brentwood Road. There are existing public footpaths linking the site to the bus stop. Regular bus services are provided to Brentwood, West Horndon, Basildon and Grays.
- 3.10 These bus services also provide a good connection to the nearby railway stations including Brentwood (3.3 miles), West Horndon (2.6 miles) and Basildon (6.4 miles). Regular train services are provided into London Liverpool Street from Brentwood and into London Fenchurch Street from West Horndon and Basildon.
- 3.11 Shenfield Station is 3.6 miles to the north of the site. When the full Crossrail service commences in 2019, there will be 12 trains per hour from and towards central London in peak periods. The site is therefore in an ideal location for easy access into London.
- 3.12 There are no Public Rights of Way running through the site. There is an existing footpath to the west of the site, which provides a sustainable link from the site to the facilities available in the village centre to the north and also to the wider public footpath network.
- 3.13 The location of the site and its existing and proposed footpath, bus and rail links make the site accessible, helping to reduce the need to travel. The site therefore adheres to the Council's aim to facilitate and promote sustainable transport

### **Designations**

- 3.14 The site is located outside of the Herongate Conservation Area, abutting it on its southern boundary.
  
- 3.15 The site is located in Flood Zone 1 and therefore is considered to be at the lowest risk from flooding. The only flood mitigation that would be required would be that resulting directly from the development of the site and will be fully managed as part of any proposal.

#### 4. SUMMARY

4.1 Our client supports Brentwood Council's approach in planning to meet its full OAN within the Borough. However, we have the following concerns:

- Over-reliance on Dunton Hills Garden Village to provide 40% of the allocated housing growth;
- The lack of flexibility in the strategy to accommodate un-met need from neighbouring authorities;
- Limiting the housing requirement to just 380 dwellings per year prevents sustainable sites that are available now coming forward within the plan period and does not acknowledge the changes to calculating housing need using a standardised methodology.
- The current approach is limiting to sustainable development opportunities and may not deliver the full extent of the housing provision in the plan period.

4.2 It is considered that identifying more sites for modest development in sustainable locations such as our client's site would be an appropriate solution to meeting the identified housing needs across the Borough and would not lead to the loss of large areas of the Green Belt in concentrated locations.

4.3 The inclusion of sites such as land at Heron Court will provide Brentwood Borough with a range of sites that enable a flexible approach to housing delivery and ensure that land comes forward within the plan period. Brentwood's current strategy to largely rely on the Dunton Hills Garden Suburb and windfall sites could result in issues with delivery which prevent the Borough meeting its identified housing need and result in the Borough continuing to be unable to demonstrate a five-year supply of deliverable housing sites.

## Appendix 1: Site Location Plan

Copyright Pegasus Planning Group Ltd. Crown copyright. All rights reserved. Ordnance Survey Copyright Licence number: 100042093. Promap. Licence number: 100020449. EmagSite Licence number: 0100031673. Standard OS licence rights conditions apply. Pegasus accepts no liability for any use of this document other than for its original purpose, or by the original client, or following Pegasus' express agreement to such use. T: 01285 941717 www.pegasusppg.co.uk



**KEY**

 **SITE LOCATION (0.62HA)**

## LAND AT HERONGATE, BRENTWOOD - SITE LOCATION PLAN








## Appendix 2: Concept Plan

Copyright Pegasus Planning Group Ltd. Crown copyright. All rights reserved. Ordnance Survey Copyright Licence number: 100020093. Pegasus accepts no liability for any use of this document other than for its original purpose, or by the original client, or following Pegasus' express agreement to such use. T 01285 441717 www.pegasuspg.co.uk



**KEY**

-  SITE BOUNDARY
-  EXISTING VEHICULAR ACCESS
-  POSSIBLE FOOTPATH LINK
-  EXISTING VEGETATION
-  INDICATIVE NEW VEGETATION

**LAND AT HERONGATE, BRENTWOOD - ILLUSTRATIVE LAYOUT**





## Appendix 3: Facilities Plan

Land at Heron Court, Herongate

