

B Harvey & G Pyle



8th March 2018



Dear Sirs

### **Draft Local Plan - Preferred Site Allocations - 2018**

Further to previous submissions made by the JTS Partnership on behalf of Thorndon Park Golf Club, (TPGC), additional representation is hereby submitted in response to the consultation exercise.

This submission is made by Messrs. Harvey & Pyle, with agreement and support from TPGC, due to their joint beneficial interest. The TPGC, land adjoins the land in Harvey & Pyle's ownership, which is subject to a long - term legal option agreement with TPGC and provides the site access.

The current option terms provide for the entire site to be sold, should future residential planning consent be granted.

Although previous representations by JTS stated that the subject site is suitable to accommodate up to 6 dwellings, should it be possible for the same density to be applied as the immediate adjoining settlement, this could increase to about 8 or 9 dwellings.

The JTS Partnership previously highlighted to the local planning authority (LPA) that all of the sale proceeds received by TPGC will be used by the Club to maintain and improve the quality and standard of the Club, which is the only Club in Essex to be in the top 100 within the country.

Acknowledged as one the finest in South East England, it serves as an important local business and is a real asset and accolade to Brentwood Borough.





Allocation of the site for future development would enable this important local business to further prosper from future growth and development. The Club's hope is for this to create additional local employment opportunities. With all of the money it manages to raise from the site sale proceeds being

injected back into the club, it would thus mean the facilities and golf course's high golfing standards can be raised to an even higher level, thereby creating prosperity for future generations of local club members to enjoy.

With the Club attracting visitors from all over the World, increasing visitor numbers undoubtedly should provide additional benefit to the local economy during visits and stays within the area.

The current proposed new housing allocation throughout the borough, limits choice and ignores local market demand, for only 169 out of the total 8,263 new housing allocations are being distributed to the larger villages, equating to a little over 2%. The larger villages, like Ingrave and Herongate have no new housing allocation, despite robust local market housing demand. This is considered wholly inadequate and there should be more housing allocated on the edge of the larger villages and settlements, with a small limited amount within the smaller villages.



## Green Belt Assessment



The site does not serve the 5 purposes of Green Belt and therefore the current LDP review is the ideal time to consider changing its designation with a release from the green belt.

- This small well contained sustainable site is in a convenient village location a little over 2 miles south of Brentwood town centre. It is a readily deliverable land parcel that could readily fulfil the continuous demand for high quality upscale executive homes within this village location.
- Development of the site would have little or no visual impact on the existing residential area, due to its natural containment and furthermore it would be readily viewed as a natural extension to the existing small residential cul de sac of upscale homes.
- It would also be a natural infill to the settlement, with the golf course and retention of various selected mature trees forming a natural defensible, green belt boundary.

Green Belt is a strategic policy tool which has been used to restrict development around and between towns and cities. The NPPF para 80 establishes five purposes for including land within the Green Belt.

1. To check the unrestricted sprawl of large built-up areas
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and spatial character of historic towns
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

In terms of purpose 1 and 2, it is relevant to consider the site's context.

The site is contained and surrounded on 2 sides by existing residential development in Ingrave and Herongate

It adjoins the Golf course to the West and the Ingrave Johnstone C of E Primary school recreation playing field to the East and therefore has a significant degree of visual and physical containment. In light of this any future development would be visually contained and seen as a logical infill, rather than sprawl.

In terms of 3, the extent of any encroachment would be minimal and logical, given the established residential area of which this would be a natural finalised extension.

In terms of purpose 4, the development would not impact upon the setting or spatial character of a historic town.



## National Policy Context

The National Planning Policy Framework (NPPF) was adopted in March 2012. This document replaced all previous national policy documents, including all Planning Policy Statements and Planning Policy Guidance Notes, as well as selected Circulars.

The NPPF is an overarching document which established a new national planning policy agenda focused specifically upon the delivery of sustainable development. It must be taken into account in the preparation of Local and Neighbourhood Plans and is a material consideration in planning decisions.

The latest consultation on the revised (NPPF) includes a stipulation that 20% of Councils' housing supply pipeline should comprise of small sites, subsequently defined as smaller than half a hectare.

**When reviewing the sites currently put forward, the Council falls significantly short of this target.**

Paragraph 7 of the NPPF specifically sets out the basis for the achievement of sustainable development in planning terms and defines three key roles in the planning system:

- An economic role
- A social role
- An environmental role

Paragraph 9 of the NPPF sets out the following points for consideration when assessing whether development is sustainable:

- Making it easier for jobs to be created in cities, towns and villages
- Moving from a net loss of bio-diversity to achieving net gains for nature
- Replacing poor design with better design
- Improving the conditions in which people live, work, travel and take leisure

Furthermore, with regard to sustainable development, NPPF Paragraph 14 states:

“At the heart of the National Planning Policy Framework is a presumption in favour

of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking”.

With no allocated “green belt release sites” within the large villages of Herongate and Ingrave there is a need for some limited development, in order to sustain these villages. It is considered that the proposed site development for the TPCG would represent a small yet meaningful way of providing some limited housing within this village location.

The Council states “No amendment is proposed to the Green Belt boundaries surrounding large villages, in order to retain the character of the Borough in line with the spatial strategy.”

Development of “this specific site” would not affect the character of the Borough in line with the spatial strategy in any way whatsoever!

## **Sustainability Appraisal January 2018**

Paragraphs 6.5.20 of that Sustainability Appraisal states the following:

*6.5.20 “The 2016 Draft Plan did not propose allocation of any sites; however, subsequent detailed work by the Council to examine site options - including through detailed Green Belt review - led to the identification of several development opportunities. There is also a strategic context, in light of the 2017 Housing White Paper, which supports smaller sites and growth at villages, and “expect(s) local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up.”*



## Ingrave & Herongate

6.5.19 *"The 2016 Draft Plan did not propose allocation of any sites; and subsequent detailed work by the Council to examine site options did not lead to the identification of any additional potentially suitable and deliverable opportunities. As well as Green Belt, this area is relatively sensitive in landscape, biodiversity and heritage terms. Equally, there are considered to be limited strategic arguments in favour of allocation. As such, there is limited argument for examining higher growth options in detail. There will be the opportunity to review this position subsequent to the current consultation."*



*View towards the site entrance via the existing cul de sac*





*View from top of Thorndon Approach towards the A128 Brentwood Rd.*



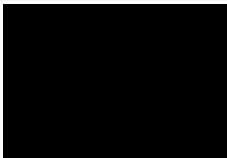


We suggest that the allocation of this site should be reviewed; it is completely enclosed and contained and is unseen from wider viewpoints. It has minimal impact and green belt contribution and should be viewed in the context of logical rounding off and a small extension to a cul de sac.

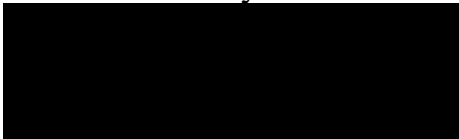
In view of the added benefits from its allocation, as a result of the TPGC connection, the wider potential economic and employment contribution factors to the local economy, can see this as also being viewed as a "special circumstance."

We request that this further representation be considered and for the Council to reconsider this site as part of their smaller site allocations going forward.

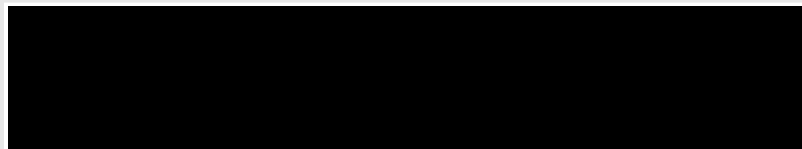
Without some greater allocation to the larger villages, we would consider the emerging plan to be unsound.



Yours faithfully



B Harvey & G Pyle



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