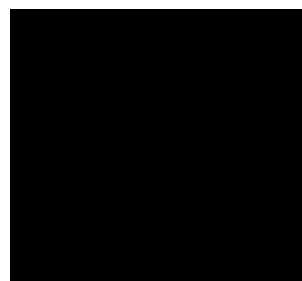


12 March 2018



Mr Phil Drane  
Planning Policy Team Leader  
Brentwood Borough Council  
Town Hall  
Ingrave Road  
Brentwood  
CM15 8AY



Sent via email to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

Dear Mr Drane

**CONSULTATION ON DRAFT LOCAL PLAN PREFERRED SITE ALLOCATIONS  
EAGLE AND CHILD PUBLIC HOUSE, CHELMSFORD ROAD, SHENFIELD, CM15 8RG**

Thank you for providing us with the opportunity to engage in the consultation on the Council's Draft Local Plan Preferred Site Allocations. We write on behalf of our clients, Messers A, J and C Courage, who own the freehold of the Eagle and Child Public House, Shenfield and have begun working to develop proposals for its redevelopment.

Our client's site has been identified within the Draft Local Plan Preferred Site Allocations for residential development with a capacity of 20 new residential dwellings (Site Ref. 311). The proposed allocation of the site for residential development is strongly supported by our client. We set out our detailed comments on the Draft Local Plan Preferred Site Allocations within this letter.

**The Site**

The site is in Shenfield, on the southern side of Chelmsford Road, between Hutton Road and Shorter Avenue and opposite Courage's playing fields.

The site extends to approximately 0.24 hectares and is broadly L-shaped. The public house is located in the western part of the site, with an extensive garden to the rear, and the eastern part of the site comprises hardstanding used for car parking. The existing building dates from the 1930's but has a 1950's extension and rises to two storeys in height. The existing building is not statutorily or locally listed, nor is it located within a conservation area. The public house is currently leased with a break available in 2019, making it available for development.

The site is located within a predominantly residential context. The site is bound by Chelmsford Road to the north, on the north side of which lies residential dwellings with the playing fields and Shenfield Cricket Club beyond. Adjacent to the site at the eastern boundary is Sawyers Court; a retirement housing development rising to 2.5 storeys. To the south of the site is Ardleigh Court which comprises a series of residential apartment buildings rising to between two and three storeys. The west of the site is bound by residential properties fronting Chelmsford Road (Nos. 7, 9, 11 and 11a) and Hutton Road (No. 20 and Nos. 1-4 Gabriel Mews).

The site is located within Flood Zone 1, which indicates that the site has a low probability of flooding. There are a number of trees on the site, predominantly located to the rear of the existing building, none of which are subject to Tree Preservation Orders.

The site is located approximately 350m northwest of a number of high street facilities located on Hutton Road, including convenience stores, banks, post office, restaurants and takeaways, cafes and bars, pharmacy and hair and beauty salons. There are a number of educational facilities in the area surrounding the site, including Shenfield Day Nursery (approx. 100 metres southwest), St Mary's Primary School (approx. 230 metres west) and Shenfield High School (approx. 1km northeast). With regards to healthcare facilities, Rockleigh Court Doctor's surgery is located approximately 320 metres southeast of the site.

The site is located approximately 550 metres from Shenfield National Rail Station, which is located to the south east of the site on Hutton Road and provides TFL Rail and Greater Anglia services towards London Liverpool Street as well as Greater Anglia services to a number of destinations within Essex and East Anglia including Southend Victoria, Clacton on Sea, Colchester Town, Braintree and Ipswich. In addition, from December 2018 Shenfield will provide Crossrail / Elizabeth Line services to central London. The site is located approximately 2.5km (3 minute drive) from the nearest intersection with the A12 which provides links to central London as well as to Essex and East Anglia.

### **Comments on the Draft Local Plan Preferred Site Allocations**

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic. Plans should be deliverable and the scale of development identified in the plan should not be subject to such obligations and policy burdens that their ability to be developed viably is threatened.

The Draft Local Plan Preferred Site Allocations seeks to allocate the site for residential development (Site Ref. 311). The emerging allocation seeks the delivery of 20 dwellings on the site within the first five years of the Plan. We welcome the additional consultation and site allocation and in particular we would like to take this opportunity to express our strong support for the proposed allocation of the site for residential development.

#### *Sustainability*

The site is located within the development boundary of Shenfield and comprises previously developed land. At the national level, a key principle of the NPPF is the re-use of previously developed, or brownfield land. This principle has informed the Council's emerging spatial strategy, which seeks to develop land sequentially with brownfield land and sites within settlement boundaries being prioritised for development. The proposed allocation of the site for redevelopment is therefore wholly in accordance with national and local policy objectives.

The Council cannot currently demonstrate a five year housing land supply but, in order to meet the objectively assessed need for housing, proposes to significantly increase its housing delivery target within the emerging Local Plan. The redevelopment of brownfield sites will be key to meeting these needs and is expected to deliver up to 74% of the total delivery across the Plan period. The site at the Eagle and Child Public House is a preferable and necessary in order to ensure the Council meets its objectively assessed housing need. In addition, the intention for the site to be delivered within the first five years of the Plan will help the council to demonstrate a five year supply of land for housing.

The NPPF at paragraph 14 outlines an underlying presumption in favour of sustainable development, indeed sustainable development is considered the 'golden thread' that should run through both plan-making and decision-taking. This is reflected within the emerging Local Plan which seeks to focus new development on sites which are accessible to public transport.

The site is located in an accessible location with good public transport links to London and other locations within Essex and East Anglia, as well as good connections with the local highway network. In addition, the site is well

supported by community facilities such as schools and healthcare providers, as well as local retail provision. Furthermore the site is not within an area at risk of flooding, and as set out above, comprises a brownfield, previously developed location. Therefore the site is considered to be a sustainable location for development and its allocation is supported by national policy and the Council's emerging strategies.

### *Deliverability*

Our client owns the freehold to the site and there is a break in the existing lease in 2019 which would make the site available for redevelopment. The site is therefore considered to be deliverable for residential development within the next five years, in line with the Council's intentions as set out in the draft allocation.

However, it is acknowledged that the site is currently occupied by the Eagle and Child Public House which is considered to be a local community facility. Saved Policy LT11 seeks to retain existing local community facilities which, in the first instance, is considered to be of the greatest importance in rural locations as opposed to urban locations such as Shenfield, where the site is located.

Policy LT11 sets out that the loss of such facilities will be permitted where it is to be replaced by more suitable facilities elsewhere within the local area. We note that there are a number of other public houses within the Shenfield as follows:

- Ye Olde Greene Dragon, Chelmsford Road – approximately 75 metres west of the site
- The Lot, Hutton Road – approximately 425 metres east of the site
- HWB, Hutton Road – approximately 525 metres east of the site
- Hutton Junction, Rayleigh Road – approximately 770 metres east of the site
- The Rose, Chelmsford Road – approximately 870 metres northeast of the site

In this regard we consider that there are sufficient alternative facilities within Shenfield to meet local needs such that the loss of the existing use of the site would be acceptable and would not be detrimental to the local community.

In addition, we note that, since the Council cannot currently demonstrate a five year supply of land for housing and that the housing target for the borough is proposed to increase significantly within the new Local Plan, the loss of the existing use of the site is considered to be demonstrably outweighed by the need for housing.

The draft allocation seeks the delivery of 20 dwellings on the site. Our client has begun preparing proposals for the redevelopment of the site and considers that the delivery of 20 dwellings on the site is achievable through the provision of new residential buildings rising to a maximum of four storeys.

The provision of 20 dwellings on the site would equate to a density of 83 dwellings per hectare which is considered to be wholly appropriate in this sustainable and accessible location. Development at this density would maximise and best and efficiently use this brownfield site in line with the requirements of the NPPF.

### *Summary*

Overall, we consider that the emerging Local Plan is being prepared in line with the requirements of the NPPF in order to meet local needs. The Draft Local Plan Preferred Site Allocations has been prepared as part of a comprehensive plan-making process including the consideration and testing of a number of growth options and alternatives. The Plan has been positively prepared with significant involvement from local residents and stakeholders including consultation on the Strategic Growth Options in 2015 and the Draft Local Plan in 2016 as well as a Call for Sites in 2017. The development strategy for the borough and the proposed site allocations, including that of our client's site, have therefore been well informed and are considered to be robust.

In addition, the Council's Sustainability Appraisal, which forms a key part of the evidence base to the emerging Local Plan, provides an assessment of the proposed allocations. The site at the Eagle and Child Public House



is considered to be a sustainable option for allocation and development, with no significant issues precluding allocation in sustainability terms.

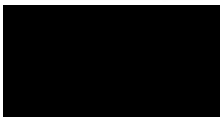
Overall the site is considered to be a sustainable location for development, in the first instance because it comprises previously developed land within an established settlement boundary, but also because it is located in an accessible location. In addition, the site is considered to be available for development and new residential dwellings can be delivered within the first five years of the new Local Plan. Its allocation for the delivery of 20 new residential dwellings is considered wholly appropriate and is strongly supported.

**Conclusion**

We trust that the above is of assistance in the preparation of the new Local Plan for Brentwood. We would like to be kept up to date with the progress of the Local Plan and look forward to future opportunities to engage.

We look forward to confirmation of receipt of these representations.

Yours sincerely



**Catherine Williams**  
Associate Director