

19 March 2019

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

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

Dear Sir / Madam,

**BRENTWOOD DRAFT LOCAL PLAN PRE-SUBMISSION DOCUMENT CONSULTATION  
Land at Wyatts Green Road, Swallows Cross**

We write in response to the consultation currently being undertaken by Brentwood Borough Council (BBC) in relation to the Draft Local Plan Pre-Submission Document (February 2019). We write on behalf of our client, MM Properties (London) Ltd, to promote the site above for residential uses within the Plan period. This follows pre-application discussions with the Council on the site in respect of it being brought forward for residential development.

The site is located within the Green Belt, but in-part comprises previously developed land. It is the intention of our client to bring forward the site at the first available opportunity. The site is available now, and can make an immediate contribution to the Borough's housing supply.

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to apply the presumption in favour of sustainable development<sup>1</sup>. It 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<sup>2</sup>.

Paragraph 35 of the NPPF identifies the criteria on which Local Plans are assessed on to determine whether they are 'sound'. Plans are 'sound' if they are:

- **Positively Prepared** – be based on objectively assessed development requirements, consistent with achieving sustainable development
- **Justified** – be the most appropriate strategy based on proportionate evidence
- **Effective** – be deliverable over its period and based on effective joint working
- **Consistent with National Policy** – enable the delivery of sustainable development in accordance with the policies of the NPPF.

Site and Surrounding Area

The site is located to the south east of Wyatts Green, and north of Swallows Cross, and accessed by Wyatt's Green Road. A copy of the site location plan is enclosed with this letter.

The site is roughly rectangular in shape, and measures approximately 1.3 hectares in area. Wyatt's Green Road forms the southern boundary of the site, and the eastern boundary is defined by Mountnessing Road. The site is well screened by mature trees at the northern boundary, beyond which is an existing residential dwelling set within a large plot.

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<sup>1</sup> Paragraph 11

<sup>2</sup> Paragraph 16



The surrounding area is predominantly residential in character. There are two storey dwellings opposite the site on Wyatt’s Green Road and bungalows immediately east of the site. Chivers Farm is located to the south east of the site and Swallows Cross Farm is located to the west of the site off Wyatt’s Green Road. This farm is subject to a full planning application for 18 dwellings which is pending determination (LPA reference 18/01579/FUL). This follows the grant of outline planning permission in April 2017 for 9 dwellings (LPA reference 17/00211/OUT). In recommending this application for approval, officers concluded that the redevelopment of the site for residential purposes would not be locationally unsustainable.

The site is within close proximity to existing bus stops along Wyatt’s Green Road, including the 436, 431 and 689 which serve Ongar, Blackmore, and Shenfield, the latter of which is currently part of the TfL Rail/Elizabeth Line underground service.

Part of the site has been previously assessed in the 2011 SHLAA as a discounted brownfield site under site reference B203. A site location and extract from this assessment is below:



Figure 1: SHLAA Map – October 2011

| Location | Site Ref No | Site Name & Address   | Site Area (ha) | Ownership Information (If Known) | Current Use                                | Suitable  | Available                 | Achievable  |
|----------|-------------|---|----------------|----------------------------------|--|---|---------------------------|---|
| MTN      | B203        | Land Adjacent to "Chitral", Wyatts Green Road, Swallows Cross, Mountnessing | 0.4            | Mr B Mortlock                    | Commercial uses - parking, Industrial uses | No. The site is not suitable for residential development. The site is divorced from existing services and facilities. The site comprises a number of commercial uses and parking. Possibility of contamination. | Yes the site is available | Yes. However there maybe a level of contamination which would need to be addressed. |

Figure 2: SHLAA Brownfield Site Assessment

Since this assessment was undertaken, the site boundary has been extended to include additional land located immediately adjacent.

Site Capacity

MM Properties have developed a proposed Masterplan for the site supported by necessary technical work to address the key matters associated with the site. This demonstrates that the site has capacity for between 30-35 dwellings, including an element of affordable housing.

Planning Policy Framework

The Regulation 19 pre-submission Local Plan seeks to make provision for 7,752 new residential dwellings to be built in the Borough over the Plan period 2016-2033. A stepped trajectory is proposed, which will be implemented as follows:

- **2016/17 – 2023/24:** 1,912 dwellings at an annual average rate of 310 dwellings per year
- **2024/25 – 2032/33:** 5,840 dwellings at an annual average rate of 584 dwellings per year

The consultation document justifies the stepped trajectory through forecast delivery rates which demonstrate a significant proportion of new homes being delivered beyond 2023. The housing numbers are also justified on

the basis of the standard methodology for calculating housing need. Whilst this is the correct approach, it is evident from the calculations in the consultation document, and the accompanying Strategic Housing Market Assessment, that the inputs into the methodology used in determining a need for 350 net dwellings per year are incorrect. These amendments, against the direction and guidance of national policy, have result in a deflated housing needs figure.

The Strategic Housing Market Assessment, to which the consultation documents references, has undertaken the standard methodology calculation on the basis of the 2016-Household Projections. The MHCLG in February 2019, however confirmed that the 2014-based household projections should be used in such calculations (as they are higher). In the case of Brentwood, the use of the incorrect household projections deflates the housing need figure by circa 24%.

In addition, the 2019 median workplace based affordability ratio has been used to calculate the adjustment factor. The PPG is explicit that the most recent median workplace-based affordability ratios should be used in this calculation. At the time of writing, this is the 2017 data, although it is accepted that an update to this data is imminent. In any case, the data used for the purposes of the consultation is based on projected data that is inherently unreliable and unjustified by policy.

On the basis of 2014-based household projection data, coupled with the use of the most recent affordability ratios, the housing need figure is 454 dwellings per annum (inclusive of a cap), and not 350 dwellings per annum, as stated in the consultation document.

The Council has correctly identified that a 20% buffer is required in addition to the local housing needs assessment. This has been qualified by the MHCLG in their recent publication of the Housing Delivery Test which demonstrates that over the preceding three years, Brentwood delivered only 51% of the homes required in the Borough.

On the basis of the above, the local housing needs assessment should be recalculated to reflect changes in policy. This should include a 20% buffer. At the time of writing, this figure is 545 dwellings per annum, although it is accepted that the impending affordability ratio may result in minor amendments to this figure.

There is therefore a need to substantially increase the Council's housing requirement in the first part of the plan period. This will require additional sites to be identified and our client's site at Swallows Cross is considered to be available, suitable, and would contribute to the additional housing need identified.

#### Green Belt release

Paragraph 136 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation of local plans. The Council have prepared a Green Belt study prepared by Crestwood (November 2018) which forms part of the Local Plan evidence base. The study reports that 89% of the Borough is currently designated as Green Belt, and as such, allocated land currently designated as Green Belt is unavoidable in order to meet the development needs of the Borough in respect of housing requirements.

The Green Belt study review assessed sites being considered as part of the SHLAA assessment that were located within the Green Belt, and their relative contribution to the purposes of the Green Belt designation. Despite the suitability of the site for housing, the site did not form part of the Green Belt Assessment, however it is our submission that considering the site comprises part developed land; it has no recreational value; there is no public access; and it is physically and visually contained by the existing treeline. It therefore makes a very limited contribution to the Green Belt.

In assessing whether the release of the site from the Green Belt would conflict with the five general purposes of the designation, the following should be considered:

#### To check the unrestricted sprawl of large built-up areas

The site is contained by a thick and mature line of trees that prevents an unrestricted sprawl beyond the confines of the site. To the south of the site is Wyatt's Green Road which is abutted by development on both its northern and southern perimeter, and to the north of the site is an existing property. The closest built-up area is Wyatt's Green itself which is separated from the site by over 1km of open fields, which are also designated Green Belt.

Of particular relevance is the brownfield nature of the site which contrasts with the open fields that surround the immediate built-up area. A significant proportion of the site is hardstanding and built form, and so any encroachment into the countryside will be minimal.

#### To prevent neighbouring towns merging into one another

As mentioned above, the site is well contained by the existing road infrastructure and tree line on the northern border. Furthermore, the site is over 1km from the settlement of Wyatt's Green and over 1.3km from the village of Doddinghurst. As such, there is no prospect of neighbouring towns merging into one another.

#### To assist in safeguarding the countryside from encroachment

The application site as it stands makes a very limited contribution to the open countryside. It is completely enclosed with no public access, and adds little to the rural landscape character or quality. The site's contained nature, and the existing development accommodated on the site means that the prevailing open character of the wider countryside will not be materially altered.

#### To preserve the setting and special character of historic towns

The site is not located within or adjacent to a Conservation Area. There are two historic buildings<sup>3</sup> associated with Ray Place Farm to the north, however the line of trees and vegetation that exists between the two sites means that it is not possible to view the adjacent listed buildings from the site. Development on the site would therefore not impact upon the setting of any historical assets.

#### To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The eastern part of the site is occupied by commercial buildings and activities. The allocation, and development of this site, would therefore recycle this brownfield land in terms of urban regeneration and as part of the wider redevelopment of the site. Of particular relevance in this case, is the number of alternative sites being removed from the Green Belt which do not constitute previously developed land. In this respect, the site is considered sequentially preferable in terms of the Green Belt objectives than other Green Belt sites considered deliverable by the Council.

#### Alternative allocated sites

As a means of meeting the uplift to the Council's housing requirement, BBC has allocated a number of sites in the Green Belt where it has been determined that harm to the landscape and openness will be minimised. The Council states that a sequential land use test, in line with guidance and best practice has been undertaken to prioritise growth based on brownfield land and land in urban areas first; and only then brownfield land in Green Belt areas where deemed appropriate.

Despite this, a number of Green Belt sites have been allocated in the plan for residential purposes that are entirely greenfield, or comprise some brownfield elements that make up a small proportion of the site. The site at Wyatts Green Road accommodates a significant proportion of brownfield land, despite its Green Belt designation, and therefore should be released from the Green belt and allocated for residential uses.

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<sup>3</sup> Barn 22 metres north west of Ray Place Farmhouse (UID: 1280846) – Grade II, Ray Place Farmhouse (UID: 1197174) – Grade II

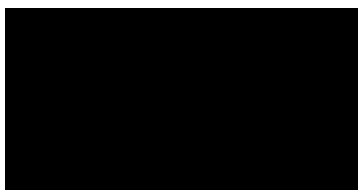
This is especially relevant given the need for an uplift to the housing requirement given the required amendments to standard methodology calculation as identified earlier in this representation.

Conclusion

Overall, this site is a sustainable urban extension within the Green Belt that can make a contribution to the borough's housing land supply over the life of the Plan. The majority of the site is brownfield land, with the greenfield element of the site well contained by existing roads and tree lines. The site also has good access to Wyatt's Green Road, including the bus services that operate on this route. It is suitable and available, and a development of between 30-35 dwellings is achievable. It is therefore respectfully requested that the site is allocated for residential development in the emerging Local Plan.

We look forward to receiving confirmation of receipt of these representations and would welcome the opportunity to discuss matters further with officers in due course.

Yours sincerely



Catherine Williams  
Associate Director

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**REVISIONS**

- 12.02.2019 EJ

PRELIMINARY



**Hoare,  
Ridge &  
Morris**  
Architects

PROJECT SWALLOWS CROSS

DRAWING TITLE Site Location Plan  
Showing site area edged in red

SCALE 1:1,250 at A3

STATUS PRELIMINARY

DRAWING NO. **133. SK09**

Hoare Ridge & Morris LLP  
Building 19  
Snape Maltings  
Suffolk IP17 1SP

01728 688747  
hrma@hrma.co.uk  
www.hrma.co.uk

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