



# Brentwood Pre-Submission Local Plan (Regulation 19)

January 2019

## COMMENT FORM

From Tuesday 05 February to Tuesday 19 March 2019 we are consulting on the next stage of the Brentwood Local Plan: Pre-Submission Local Plan (Regulation 19). You can view and comment on the consultation document online at:  
**[www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)**

Alternatively, please use this form to share your views on the contents of the document.

All responses should be received by 5PM Tuesday 19 March 2019.

Please return forms either by attaching completed forms by email to **[planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)** or alternatively by post to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY.

### How to complete the representation form:

This form consists of two sections – Section A: Personal Information, and Section B: Your Representation. Please note that your representation cannot be accepted without completing information identified in Section A.

The Local Plan Pre-Submission (Regulation 19) consultation consists of more formal and technical questions focused on the four Tests of Soundness and whether the Local Plan is compliant with relevant legislation. Comments are to be focused on three core areas – is the Plan positively prepared (referred to as ‘soundness’), does the Council adhere to the Duty to Cooperate, and is the Plan legally compliant (addressed by question 3 of this comment form). These terms are defined below:

- a) **Soundness:** Local Planning Authorities must prepare a Local Plan based on relevant and appropriate evidence base. They are required to publish these documents on their website. The evidence used to develop the Brentwood Local Plan can be found on the Council’s website under Evidence Base.
- b) **Duty to Cooperate:** Throughout the plan-making process discussions have taken place with various statutory consultees and neighbouring authorities. A summary of these meetings can be found within the Duty to Cooperate Statement, published as part of the Regulation 19 consultation. This is a live

document and will be updated prior to being submitted to the Secretary of State.

- c) **Legally Compliant:** Local Planning Authorities must prepare a Local Plan which adheres to the requirements as set out in the National Planning Policy Framework (NPPF), planning practice guidance, and other relevant planning regulations & legislation.

Question 4 of this comment form asks for further information on your opinion of the Plans 'soundness'. According to the National Planning Policy Framework (NPPF) para 35, Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

Please keep in mind the information provided above to assist with correctly completing your comment form. For additional information on what the difference is between a Regulation 18 and Regulation 19 Local Plan consultation, please view the FAQ's published on-line [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)

#### **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 the above conditions.

**Section A: Personal Details**

Title	Mr
First Name	Stuart
Last Name	Willsher
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Organisation (if applicable)	Phase 2 Planning
Address	250 Avenue West Skyline 120 Great Notley Braintree Essex
Post Code	CM77 7AA
Telephone Number	01376 329059
Email Address	swillsher@phase2planning.co.uk

## Section B: Your Representation

Please complete a separate sheet for each representation that you wish to make. You must complete 'Part A – Personal Details' for your representation to be accepted.

Representations cannot be treated as confidential and will be published on our Consultation Portal. Any representations that are considered libelous, racist, abusive or offensive will not be accepted. All representations made will only be attributed to your name. We will not publish any contact details, signatures or other sensitive information.

Full Name	Stuart Willsher – Phase 2 Planning
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

Sustainability Appraisal

Habitat Regulations Assessment

Question 2: Please indicate which section of the indicated document identified above that you are commenting on (where applicable please clearly state the section / heading or paragraph number).

STRATEGIC POLICY SP02: Managing Growth  
Chapter 9 – Site Allocations & Local Development Plan Housing Trajectory

Question 3: Do you consider the Local Plan is:

Sound?

YES

NO

Legally Compliant?

YES

NO

Compliant with the Duty to Cooperate?

YES

NO

Question 4: If you consider the Local Plan unsound, please indicate your reasons below (please tick all that apply):

The Local Plan has not been positively prepared

The Local Plan is not justified

The Local Plan is not effective

The Local Plan is not consistent with national planning policy

Question 5: Please provide details of either:

- Why you consider the Plan to be sound, legally compliant, or adheres to the Duty to Cooperate; or
- Why you consider that the Local Plan is unsound, is not legally compliant, or fails to comply with the Duty to Cooperate

Please see accompanying representation submitted on behalf of RS2 Properties Ltd

Please continue on a separate sheet if necessary

Question 6: Please set out what modification(s) you consider necessary to make the Local Plan sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this modification will make the Local Plan sound or legally compliant. Please be as accurate as possible.

Please see accompanying representation submitted on behalf of RS2 Properties Ltd

Please continue on a separate sheet if necessary

Question 7: If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the Examination in Public (EiP)?

NO, I do not wish to participate in the oral part of the EiP

YES, I wish to participate in the oral part of the EiP

Question 8: If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

Please see accompanying representation submitted on behalf of RS2 Properties Ltd

Please continue on a separate sheet if necessary.

Please note that the Inspector (not the Council) will determine the most appropriate procedure to hear those who have indicated that they wish to participate in the oral part of the Examination.





# Phase 2

## Brentwood Local Plan Pre-Submission Document

Regulation 19 of the Town and Country Planning (Local Planning) Regulation 2012

41 Shenfield Road, Brentwood, Essex CM15 8EN

On Behalf of

**RS2 Properties Ltd**

**March 2019**

**Our Ref: C17102**

**Phase 2** PLANNING & DEVELOPMENT LIMITED

250 Avenue West | Skyline 120 | Great Notley | Braintree | Essex | CM77 7AA | 01376 329059 | [www.phase2planning.co.uk](http://www.phase2planning.co.uk)

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## 1. Introduction

- 1.1 This representation has been made towards the Brentwood Local Plan Pre-Submission Regulation 19 consultation document, on behalf of our client, RS2 Properties Ltd, who is seeking to promote land at 41 Shenfield Road through the Local Plan process for residential development. A site location plan is attached as Appendix 1.
- 1.2 The site comprises the dwelling at No.41 Shenfield Road, which is sited within the residential area and outside the Green Belt. Land to the south of the dwelling lies within the Green Belt, albeit abutting the residential area on its southern, western and eastern boundaries.
- 1.3 Shenfield Road is the main road which links the centre of Brentwood with the A12, which runs through Essex into London. The site lies within a clearly sustainable location, lying 600m from the town centre; 1200m from the train station; adjacent to the Brentwood Sports Ground and Cricket Club; 1200m from primary schools and sports pitches on Sawyers Hall Lane; 300m from Brentwood Community Hospital; and 400m from Brentwood School.
- 1.4 In all respects, the site lies within a sustainable location and development on this site would comply with the Government's core planning principle to focus development in locations which are sustainable.
- 1.5 A development on this site of between 30-65 dwellings per hectare (as Policy H14 of the existing Local Plan would require) could result in a scheme of between 21-46 dwellings. RS2 Properties Ltd have not identified any site-specific constraints which would preclude development on this site coming forward and would bring forward development on this site within five years.
- 1.6 This representation follows the submission of the site, during the 'Call for Sites' in November 2017, as a site suitable for residential development, and representations made in March 2018 in respect of the Preferred Site Allocations (Regulation 18). A copy of these earlier representations are provided as Appendix 2.
- 1.7 These representations have adopted the format of the Local Plan comments form and are based around answering the following questions:
- Question 5: Please provide details of either:  
Why you consider the Plan to be sound, legally compliant, or adheres to the Duty to Cooperate; or  
Why you consider that the Local Plan is unsound, is not legally compliant, or fails to comply with the Duty to Cooperate;
  - Question 6: Please set out what modification(s) you consider necessary to make the Local Plan sound or legally compliant, having regard to the matters that you identified above; and

- 
- Question 8: If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

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## 2. Question 5

Please provide details of either:

**Why you consider the Plan to be sound, legally compliant, or adheres to the Duty to Cooperate; or**

**Why you consider that the Local Plan is unsound, is not legally compliant, or fails to comply with the Duty to Cooperate.**

[STRATEGIC POLICY SP02: Managing Growth](#)

- 2.1 It is not considered that the Local Plan is sound, as the Council's Housing Requirement is not considered to have been calculated correctly.
- 2.2 The Planning Practice Guidance section on 'Housing and economic needs assessment', which was updated on 20 February 2019, confirms at '*Paragraph: 005 Reference ID: 2a-005-20190220*' that 2014 based household projections should be used as the baseline for the 'standard method'. The reason given for this approach is to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.
- 2.3 Paragraph 4.13 of the Local Plan confirms that Council's 'housing requirement figure' to be 350 dwellings per year. With a 20% uplift, the total annual housing requirement is 456 dwellings per year.
- 2.4 This housing requirement has been calculated within the Strategic Housing Market Assessment, published in October 2018 (i.e. before the latest Planning Practice Guidance assessment). This Assessment confirms that the housing requirement has been calculated using the 2016 population projections as a starting point (see paragraph 8.26 of the SHMA in particular). Accordingly, the Plan cannot be considered to be sound on this basis.
- 2.5 An indicative assessment of housing need based on the Standard Method using the 2014 population projections was published in September 2017. This stated that Brentwood's housing need, based on the Standard Method, was 454 dwellings per annum. Applying the 20% uplift to this figure would result in a housing requirement of 545 homes per year, or a total of 9,262 homes during the plan period 2016-2033.
- 2.6 This is an increase of 1,510 dwellings from the housing requirement calculated by the SHMA calculations which uses the 2016 population projections as a starting point.

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- 2.7 Accordingly, we consider that the Inspector should, during the Examination, request that Brentwood update its evidence base, and its housing requirement, to reflect the 2014 based population projections. This will result in the requirement to identify additional site allocations, as considered further below.
- 2.8 With regards to Strategic Policy SP02, therefore, it is not considered that the Brentwood Local Plan – Pre-Submission Document can be considered to be sound as, in accordance with paragraph 35 of the NPPF, the Plan has not consistent with National Policy in its use of 2016 population projections to determine its housing requirement. In this respect, the plan has also not been positively prepared as it will not, as a minimum, meet its objectively assessed needs.

#### [Chapter 9 – Site Allocations & Local Development Plan Housing Trajectory](#)

- 2.9 The sites that the Borough Council have identified for residential development are detailed at Chapter 9 of the Local Plan. Table 4.2 of the Local Plan identifies that the allocations total 6,088 dwellings, with the remaining dwellings comprising completions between 2016/17 & 2017/18 (363 dwellings); extant permissions (926 dwellings); and the windfall allowance between 2023-2033 (410 dwellings).
- 2.10 Accordingly, should the Inspector agree with our assessment that Brentwood’s housing requirement is not sound, and the housing requirement thus increases, it would therefore be necessary to identify additional sites for allocation.
- 2.11 The following section of this Representation provides support for land at 41 Shenfield Road, Brentwood, to be allocated for residential development.
- 2.12 Notwithstanding this, it is considered that additional sites will be required in any event to ensure the housing requirement is met. Appendix 1 of the Local Plan sets out the Council’s anticipated Housing Trajectory, which we do not agree with. The Council’s calculations of when sites will be delivered, and how many dwellings will be delivered each year, appears overly ambitious.
- 2.13 In particular, Dunton Hills Garden Village is identified as being capable of delivering 2,700 dwellings during the plan period, with the site being capable of delivering 100 dwellings starting from 2022/23 (i.e. within 3 years), and then between 150 – 300 dwellings each year thereafter.
- 2.14 This level of growth from such a strategic allocation does not appear realistic. For example, it is unlikely that the Local Plan will be adopted until 2020 at the earliest (the Council’s Local Development Scheme suggests that the plan would be adopted in Q3 2019, but the timescales have slipped as the Plan was due to have been submitted in Q1 2019).

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- 2.15 For a scheme of Dunton Hills, and the level of constraints that it faces, and the vast range of application documents that would be required, including Environmental Assessment, it is realistic to assume that an outline application could take 9-12 months to be determined. Given the level of information that would be required to support the application (Consultant Reports, EA, Public/Statutory Consultation), therefore, it is realistic and reasonable to assume that it may take up to two years, from adoption of the plan in 2020, for an outline planning application to be granted planning permission.
- 2.16 There would then, of course, follow further applications to discharge conditions and Reserved Matters applications, none of which would be straight forward and would require similar levels of detail to an Outline Planning Application. This process could, itself, take 9-12 months, if not longer.
- 2.17 Accordingly, it is realistic to assume that, from adoption, it would take close to three years before planning permissions have been approved, and conditions discharged, such that development can commence on site. This would mean that, at the earliest, dwellings will not be brought forward until 2023/24, and not 2022/23 as considered by the Housing Trajectory. Such delays in the Council's Housing Trajectory will have inevitable consequences on the Local Authority being able to deliver its housing requirement during the Plan Period.
- 2.18 As such, it is considered that additional sites will be required during the Plan Period to ensure that a) the Local Authority is able to deliver its housing requirement during the Plan Period (notwithstanding our view that the Council has not calculated its correct requirement); and b) that additional sites will be required to allow for flexibility in allocated sites not being brought forward within the timescales identified within the Housing Trajectory.
- 2.19 Furthermore, it is considered that the Local Plan is not sound as it does not comply with paragraph 68 of the NPPF.
- 2.20 Paragraph 59 of the NPPF requires Local Authorities to 'boost significantly' the supply of housing and must, "ensure choice and competition in the market for land". This involves boosting provision of housing from a variety of sources, including small sites which are suitable for smaller housebuilders.
- 2.21 This is reinforced by paragraph 68 of the revised NPPF, which confirms that small sites make an important contribution to meeting housing requirements and confirms that planning authorities should accommodate at least 10% of their housing requirement on sites no larger than one hectare.
- 2.22 The Council's housing strategy only allocates 5% on sites no larger than one hectare. The NPPF confirms that smaller sites make an important contribution to meeting housing requirement, in part as they are able to be developed quickly and are able to therefore contribute towards housing supply whilst Strategic Sites are being brought forward in the background.

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- 2.23 Accordingly, it is considered that, as identified above with the Dunton Hills Strategic Allocation, that a greater percentage of smaller sites (such as land at 41 Shenfield Road) should be identified for allocation.
- 2.24 We would therefore request that the Local Authority reviews its housing supply, and particularly its approach to small sites, and allocate suitable smaller sites which can be brought forward early in the plan period.
- 2.25 With regards to the Council's approach to housing allocations and its housing trajectory, therefore, it is not considered that the Brentwood Local Plan – Pre-Submission Document can be considered to be sound as, in accordance with paragraph 35 of the NPPF, the Local Plan has not been positively prepared (as it is unlikely that the strategy will ensure that, as a minimum, the plan will meet the Council's Objectively Assessed Need), and is not consistent with national policy in its approach to allocated development on smaller sites.



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### 3. Question 6

**Question 6: Please set out what modification(s) you consider necessary to make the Local Plan sound or legally compliant, having regard to the matters that you identified above.**

[STRATEGIC POLICY SP02: Managing Growth](#)

- 3.1 With regards to Section 2, it is considered that Brentwood Borough Council will need to revisit its evidence base to determine a housing requirement which uses the 2014 population projections as a starting point. This will result in a larger housing requirement, with our estimate based on the indicative Standard Method being approximately 545 homes per year, or a total of 9,262 homes during the plan period 2016-2033.

[Chapter 9 – Site Allocations & Local Development Plan Housing Trajectory](#)

- 3.2 It is considered that additional sites should be allocated to ensure that the Local Authority can meet its housing requirement to 2033. Even if the Inspector agree with the Council's objectively assessed need, it is likely that additional sites will be required to be brought forward given the Council's overly optimistic approach to its housing trajectory, particularly with regards to Dunton Hills Garden Village.
- 3.3 Furthermore, the Local Plan does not allocate a sufficient number of 'small sites' to contribute towards the housing requirement, as per paragraph 68 of the NPPF.
- 3.4 It is considered that land at 41 Shenfield Road is an appropriate site for residential development and should be allocated for between 21-46 dwellings.
- 3.5 The site includes 41 Shenfield Road, which is sited within the residential area and outside of the Green Belt, and land to the north of the swelling, which lies within the Green Belt. This part of the site is bordered to the south and east by residential development on Shenfield Road and Glanmead.
- 3.6 There can be no dispute that the site lies within a sustainable location, lying within walking distance of Brentwood Town Centre, Brentwood Rail Station, Brentwood Community Hospital and Brentwood School. The site is therefore a suitable site for residential development, other than for the fact that it lies with the Green Belt and is therefore, technically within the Countryside (albeit bordered on two boundaries by residential development, and entirely enclosed by mature landscaping and woodland on other boundaries).
- 3.7 Brentwood Borough Council published parts 1 & 2 of its Green Belt study in January 2018. These initial parts showed 41 Shenfield Road lying on the southern edge of 'Parcel 42 Northwest of Shenfield'. The report when assessing the parcel as a whole, confirms that it

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abuts the large built up area, and that development within this parcel would be seen as an 'urban extension'.

3.8 The Green Belt Study Part 3 – “Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation” – was published in November 2018, and subsequently amended in January 2019. This part of the Green Belt Study assesses the potential Site Allocations against the purposes of the Green Belt.

3.9 41 Shenfield Road is included within Part 3 as site reference 320, with the report considering that the site makes a 'moderate' contribution towards the Green Belt. The report confirms that the site is a relatively small site, contained by woodland cover and adjacent to Shenfield.

3.10 Our own assessment against the purposes of the Green Belt is given below.

- **Purpose 1: to check the unrestricted sprawl of large built-up areas** The site lies within the urban area of Brentwood, a short distance from the town centre. The site is well constrained by existing built development and mature trees and woodland. Development would be seen as a small infill development and would have a very limited encroachment into the countryside. Existing site boundaries would prevent any further development into the Green Belt, with these boundaries presenting a strong and definite boundary to further development.
- **Purpose 2: to prevent neighbouring towns merging into one another** Development on this site would not significantly reduce the countryside gap between Shenfield and Brentwood. The countryside separation between Shenfield and Brentwood would be retained.
- **Purpose 3: to assist in safeguarding the countryside from encroachment** The site has no specific countryside function, being seen as residential gardens within the context of an Urban Settlement.
- **Purpose 4: to preserve the setting and special character of historic towns** The site has a limited relationship with the historic town of Brentwood.

3.11 Accordingly, it is considered that the site is suitable to be released from the Green Belt.

3.12 Furthermore, it is noted that the Borough Council's proposed allocations allocates a number of sites within the Green Belt which the Green Belt Study confirms as making a 'moderate' contribution to the Green Belt, similar to 41 Shenfield Road, including:

- Site R23 Brizes Corner Field, Kelvedon Hatch (23 dwellings);
- Site R25 Land north of Woolard Way, Blackmore (40 dwellings); and
- Site R26 Land north of Orchard Piece, Blackmore (30 dwellings).

3.13 The spatial strategy shown within the plan as 'Figure 5' confirms that the site lies within a 'Main Town'. Land at 41 Shenfield Road is therefore more sequentially preferable for development than a number of Preferred Site Allocations, such as those within the villages of

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Ingatestone, Kelvedon Hatch and West Thorndon, and to those identified at paragraph 3.12 of this representation.

- 3.14 Furthermore, paragraph 3.23 of the Pre-Submission Local Plan confirms that Brentwood will deliver development in terms of a sequential land use test, with land within Urban Areas preferred to all other land. There can be no doubt that land at 41 Shenfield Road lies within the urban area of Brentwood.
- 3.15 Those sites listed at paragraph 3.12 of this representation are located within villages and the rural area which can offer, as a result of their location, far fewer services and facilities than land at 41 Shenfield Road. These sites, especially, are less sequentially preferable than the site at 41 Shenfield Road.
- 3.16 Accordingly, we would request that the Local Plan be modified to allocate Land at 41 Shenfield Road for residential development, for 24 dwellings, in accordance with Policy HP03 of the Pre-Submission Local Plan which confirms that residential development proposals will generally be expected to achieve a net density of at least 35 dwellings per hectare or higher. Given the sites location within such a sustainable location, it is considered that 35dph on the site is appropriate and would accord with paragraph 123 of the NPPF which confirms that planning policies should avoid homes being built at low densities, and to ensure that development make optimal use of the potential of each site.

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## 4. Question 8

If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

- 4.1 RS2 Properties Ltd would welcome the opportunity to present oral evidence to the Inspector, if required, in order to provide further detail in respect of the proposed allocation and to provide further evidence in respect of application timescales and the deliverability of development on this site.
- 4.2 We would therefore like to participate in the examination process.

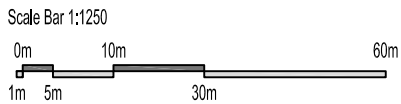
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## 5. Summary & Conclusions

- 5.1 RS2 Properties Ltd is presenting the Council and Local Plan Inspector with a site that is capable of delivering 24 dwellings, within a sustainable location. The site is suitable, available, achievable within five years, is in a highly sustainable location and performs a similar contribution to Green Belt purposes to many of the proposed site allocation within the Pre-Submission Plan. The site is sequentially preferable to these sites, given its location within the Urban Area and its location, therefore, to many shops and services and accessibility to public transport.
- 5.2 The site and its promoter meet the Governments aspirations and direction of travel in policy in terms of supporting the delivery of much needed small and medium sites to boost significantly the supply of housing and provide choice and competition as required by the NPPF, and which has been reinforced by the revised NPPF.
- 5.3 It is considered that additional smaller sites need to be allocated to allow for flexibility in the Council's housing supply; and that the Council's OAN may need to be reconsidered in light of the proposed Standard Method for calculating housing supply.
- 5.4 We therefore urge the Local Authority and Local Plan Inspector to recognise the Governments strategy and allocate the land at 41 Shenfield Road, Brentwood, Essex, CM15 8EN for delivery of 24 dwellings in the first five years of the Plan period.
- 5.5 Please record this representation as a formal submission towards the Local Plan evidence base and drafting stages and we look forward to the opportunity to presenting evidence to the Local Plan Inspector and answering any questions that the Inspector may have with regards to residential development on this site.

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## Appendix 1 – Site Location Plan



Revisions .

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All dimensions to be checked on site and any discrepancies reported to the Architect

All construction to be carried out in accordance with all relevant British Standards and Codes of Practice

**DO NOT SCALE THIS DRAWING**

Project 41 Shenfield Road  
Brentwood  
Essex

Drawing Location Plan

Drawn mkk

Scale 1:1250 @ A4

Date November 2017

**enplage**  
EMPTAGE ARCHITECTS

**WORK IN PROGRESS**  
**PRELIMINARY ISSUE - 1 03/11/2017**

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## Appendix 2 - Previous Representations





**BRENTWOOD  
BOROUGH COUNCIL**

# Brentwood Draft Local Plan Preferred Site Allocations

January 2018

## COMMENT FORM

From 29 January to 12 March 2018 we are consulting on the next stage of the Brentwood Local Plan: Preferred Site Allocations. You can view and comment on the consultation document online at [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)

Alternatively, please use this form to share your views on the contents of the document.

All responses should be received by Monday 12 March 2018

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By submitting this form, you are agreeing to these conditions.

### PERSONAL DETAILS

Title:	Mr	First Name:	Stuart	Last Name:	Willsher
Address:	Phase 2 Planning & Development Limited 250 Avenue West Skyline 120 Great Notley Braintree Essex				
Post Code:	CM77 1AA	Telephone Number:	01376 329059		
Email Address:	swillsher@phase2planning.co.uk				

## YOUR COMMENTS

**Please indicate which section(s) of the Preferred Site Allocations document that you are commenting on** (where applicable please clearly state the section/heading or paragraph number):

Part 1 - Housing and Specialist Accommodation – Need and Supply

Part 2 – Preferred Site Allocations

**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 representations, submitted on behalf of RS2 Properties Ltd, specifically in respect of 41 Shenfield Road, Brentwood, Essex CM15 8EN, to recognise the Governments housing strategy and allocate the land at 41 Shenfield Road, Brentwood, Essex, CM15 8EN for delivery of between 21-46 dwellings in the first five years of the Plan period.

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](mailto:planning.policy@brentwood.gov.uk)



# Phase 2

## Brentwood Draft Local Plan Preferred Site Allocations

Regulation 18 of the Town and Country Planning (Local Planning) Regulation 2012

41 Shenfield Road, Brentwood, Essex CM15 8EN

On Behalf of

**RS2 Properties Ltd**

**March 2018**

**Our Ref: C17102**

**Phase 2** PLANNING & DEVELOPMENT LIMITED

250 Avenue West | Skyline 120 | Great Notley | Braintree | Essex | CM77 7AA | 01376 329059 | [www.phase2planning.co.uk](http://www.phase2planning.co.uk)

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## Appendices

Appendix 1 – Site Location Plan

Appendix 2 – Call for Sites Representation 24<sup>th</sup> November 2017

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## 1. Introduction

- 1.1 This representation has been prepared in respect of the Brentwood Draft Local Plan – Preferred Site Allocations consultation document, on behalf of our client, RS2 Properties Ltd, who is seeking to promote land at 41 Shenfield Road through the Local Plan process for residential development. A site location plan is attached as Appendix 1.
- 1.2 This representation follows the submission of the site, during the ‘Call for Sites’ in November 2017, as a site suitable for residential development. A copy of this representation is provided as Appendix 2.
- 1.3 The site comprises the dwelling at No.41 Shenfield Road, which is sited within the residential area and outside the Green Belt. Land to the south of the dwelling lies within the Green Belt, albeit abutting the residential area on its southern, western and eastern boundaries.
- 1.4 Shenfield Road is the main road which links the centre of Brentwood with the A12, which runs through Essex into London. The site lies within a clearly sustainable location, lying 600m from the town centre; 1200m from the train station; adjacent to the Brentwood Sports Ground and Cricket Club; 1200m from primary schools and sports pitches on Sawyers Hall Lane; 300m from Brentwood Community Hospital; and 400m from Brentwood School.
- 1.5 In all respects, the site lies within a sustainable location and development on this site would comply with the Government’s core planning principle to focus development in locations which are sustainable.
- 1.6 A development on this site of between 30-65 dwellings per hectare (as Policy H14 of the current Local Plan would require) could result in a scheme of between 21-46 dwellings. RS2 Properties Ltd have not identified any site-specific constraints which would preclude development on this site coming forward and would bring forward development on this site within five years.
- 1.7 These representations provide additional evidence relating to sections of the NPPF Consultation 2018 that is of relevance to this site; an overview of the Preferred Site Allocations Document; highlights the Government’s support for small sites; and provides evidence to support the release of the site from the Green Belt.

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## 2. NPPF Consultation 2018

- 2.1 The consultation on the revised National Planning Policy Framework was launched on 5th March 2018, which reaffirms the Government's commitment to bring forward more homes, in the right places. The Consultation includes a number of proposals which indicates the Government's direction of travel in relation to both plan making, and decision taking, which we would like to draw to your attention.
- 2.2 Importantly, the Consultation confirms at paragraph 6 that, *"in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in planning guidance."*
- 2.3 An indicative assessment of housing need based on the Standard Method was published in September 2017. This stated that Brentwood's housing need based on the Standard Method was 454 dwellings per annum, which is a sharp increase from the Local Authorities assessment of its Objectively Assessed Need, which concluded the OAN to be 380 dwellings per year. As such, we would question whether the Local Authority needs to reconsider its OAN in light of the revised National Planning Policy Framework, which may require additional sites to be brought forward for development.
- 2.4 This representation provides evidence, within sections 3 and 4, in support of the allocation for this site to contribute towards the Local Authorities OAN.
- 2.5 The revised NPPF also clarifies its support for small sites confirming at paragraph 69 that:
- "Small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*
- *ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less;*
  - *use tools such as area-wide design assessments and Local Development Orders to help bring small sites forward;*
  - *support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
  - *work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes."*
- 2.6 Given the direction of travel of the revised NPPF, therefore, we would respectfully suggest that the Local Authority reviews the Preferred Site Allocations Document to ensure that it complies with the revised NPPF, particularly with regards to its Objectively Assessed Need; and its approach to small sites.

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### 3. Brentwood Draft Local Plan – Preferred Site Allocations Document

- 3.1 We have previously written in support of this site for residential development, and to be released from the Green Belt. Despite our earlier representations, we are disappointed that the site has not been included within the Preferred Site Allocations Document as an allocation for residential development.
- 3.2 The spatial strategy shown within the plan as ‘Figure 5’ confirms that the site lies within a ‘Main Town’. The site is therefore more sequentially preferable for development than a number of Preferred Site Allocations, such as those within the villages of Ingatestone, Kelvedon Hatch and West Thorndon.
- 3.3 In particular, sites 079A and 106 are located within Ingatestone, which features less services and facilities than Brentwood. These sites currently lie within the Green Belt. Both sites are located directly adjacent to the A12, which clearly presents a considerable noise and air quality constraint. Both sites are also located adjacent to the historic Roman Road and are therefore potentially archaeologically sensitive sites. As such, development on these sites may not be developable, and these sites, especially, are less sequentially preferable than the site at 41 Shenfield Road.
- 3.4 It is considered, therefore, that the site at 41 Shenfield Road out performs a significant number of the draft allocated sites and should be reconsidered for allocation.
- 3.5 Furthermore, it is clear that the Local Authority are relying heavily on its Strategic Allocation, at Dunton Hills, to meet its Objectively Assessed Need. Dunton Hills is allocated for 2,500 dwellings, out of the Council’s total of 6,154 dwellings - 40% of its OAN. There are also other major allocations planned in Shenfield – sites of 510, 215, 125 and 100 dwellings; Brentwood – a site for 300 dwellings, and two sites of 200 dwellings; and West Horndon – a site for 580 dwellings. Conversely, there are only a small number of small developments proposed – only 9 sites for under 50 dwellings are currently allocated.
- 3.6 Strategic developments, particularly of the scale of Dunton Hills, can inevitably take a number of years to be developed, which has the potential to lead to shortfalls in the Council’s housing supply.
- 3.7 Notwithstanding this, as highlighted within section 2 of these representations, the Council may need to reconsider its OAN in light of the emerging Standard Method calculation in assessing its Housing Need. This is particularly prevalent within Brentwood, where it could only demonstrate a 5-year housing supply of 2.67 years in November 2016.
- 3.8 As such it is considered that the Local Authority should allocate additional sites, particularly smaller sites including 41 Shenfield Rod, which is available to come forward within the next

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five years, to build in sufficient flexibility for any delays in its allocations, particularly Dunton Hills, and to address the existing shortfall in the Local Authorities Housing Supply.

- 3.9 RS2 Properties Ltd is committed to bringing this site forward for development, early in the plan period, should it be successfully allocated, which would contribute to the Council being able to meet its OAN and 5-year housing supply.



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## 4. Support for Small Sites

- 4.1 As identified within the previous section, we consider that the focus on releasing strategic sites to the detriment of considering smaller sites such as the site at 41 Shenfield Road is short-sighted and out of step with national guidance and Government Ministerial Statements, the Panning White Paper and most recently the NPPF Consultation 2018.
- 4.2 As you will be aware, paragraph 47 of the NPPF requires Local Authorities to ‘boost significantly’ the supply of housing and must, “ensure choice and competition in the market for land”. This involves boosting provision of housing from a variety of sources, including small sites which are suitable for smaller housebuilders.
- 4.3 This has been reinforced, as detailed within Section 2, by paragraph 69 of the revised NPPF, which confirms that small sites make an important contribution to meeting housing requirements and confirms that planning authorities should ensure that at least 20% of sites identified for housing in their Local Plans are of half a hectare or less.
- 4.4 As outlined above, we consider that the Preferred Site Allocations Document has an unfair bias towards larger and strategic sites in new allocations with only a small representation of sites available for less than 50 dwellings. Of the 31 allocations, only 9 sites are allocated for less than 50 dwellings (18% - less than the 20% proposed by the revised NPPF), delivering a total of 378 dwellings (less than a year’s supply), a total of only 6% of the Council’s OAN.
- 4.5 This will not assist with planning to boost significantly the supply, increase the speed in delivery which comes with smaller less constrained sites, and will not ‘ensure choice and competition in the market for land’. The Council’s approach to meeting its Objectively Assessed Need will exclude small house builders from entering the market in Brentwood and leaving those house builders with no choice but to pursue windfall sites, which largely displace existing uses. This also provides aspiring homeowners with limited choice. This is therefore an unsavoury situation when there are sites such as our site, at Shenfield Road, which is immediately available and suitable for housing, and which would ensure choice in the local housing area.
- 4.6 The Local Authority are of course aware of the importance that the Housing White Paper, published in February 2017, placed on the importance of SMEs and small sites contributing to housing growth, confirming at paragraphs 3.5 and 3.6 that:

*“3.5 Small builders have been declining and were hit hard by recession. The number of homes registered by small builders is down from 44,000 in 2007 to 18,000 in 2015 demonstrating the potential for growth.*

*3.6. The Government will help this sector to grow and develop again. Small and medium-sized house-builders regularly cite land, planning and finance as the major barriers to expansion.”*

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4.7 The remainder of the document explains how the Government will achieve this. Annex A55 states that:

*“A.55 In addition, we are proposing some further changes to promote a good mix of sites and increase the supply of land available to small and medium-sized housebuilders – something that will help to diversify the housebuilding sector and encourage more competition. These changes would:*

- make clear that on top of the allowance made for windfall sites, at least 10% of the sites allocated for residential development in local plans should be sites of half a hectare or less...”*

4.8 41 Shenfield Road lies within a highly sustainable location, close to a wide range of shops and services, and within walking distance of Brentwood Rail Station. We would request that the Local Authority reviews its housing supply, and particularly its approach to small sites, and allocate this site which will be brought forward early in the plan period.

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## 5. Green Belt Release

5.1 Brentwood Borough Council published its Green Belt study in January 2018. The study currently comprises:

- Part 1: Brentwood Green Belt in Context - A high-level historic and functional review of the London Metropolitan Green Belt, and the context against which the Brentwood Local Plan 2013-2033 is being developed; and
- Part 2: Green Belt Parcels Assessment - A borough-wide definition and relative assessment of Green Belt parcels against the five purposes of the Green Belt.

5.2 It is understood that the following reports will be published later this year:

- Part 3: Individual Sites Assessment (HELAA sites, lesser performing GB parcels and other identified sites) - A relative assessment of potential Site Allocations against the purposes of the Green Belt. This assessment process is split into two sections, the first considering individual sites and the second reflecting on cumulative impacts of potential allocations; and
- Part 4: Partial review of Settlement Boundaries and Green Belt edge – A focused review of existing settlement boundaries (and associated Green Belt definition) using study evidence.

5.3 We would therefore reserve the right to provide further representations in support of 41 Shenfield Road, if required, when Part 3 is released later this year.

5.4 41 Shenfield Road lies on the southern edge of 'Parcel 42 Northwest of Shenfield'. The report when assessing the parcel as a whole, confirms that it abuts the large built up area, and that development within this parcel would be seen as an 'urban extension'.

5.5 This site has not, to date, been individually assessed as part of the Local Authorities evidence base, and we therefore look forward to the publication of Part 3 and 4 later this year. Notwithstanding this, in relation to the Greenbelt purposes, we consider that:

- **Purpose 1: to check the unrestricted sprawl of large built-up areas** The site lies within the urban area of Brentwood, a short distance from the town centre. The site is well constrained by existing built development and mature trees and woodland. Development would be seen as a small infill development and would have a very limited encroachment into the countryside. Existing site boundaries would prevent any further development into the Green Belt, with these boundaries presenting a strong and definite boundary to further development.
- **Purpose 2: to prevent neighbouring towns merging into one another** Development on this site would not significantly reduce the countryside gap between Shenfield and Brentwood. The countryside separation between Shenfield and Brentwood would be retained.

- 
- **Purpose 3: to assist in safeguarding the countryside from encroachment** The site has no specific countryside function, being seen as residential gardens within the context of an Urban Settlement.
  - **Purpose 4: to preserve the setting and special character of historic towns** The site has a limited relationship with the historic town of Brentwood.

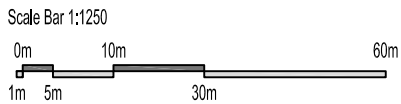
5.6 Overall, it is considered that the overall contribution of the site to Green Belt purposes is low. Development of the site would be infilling, not causing Coalescence, and within the existing limits of Brentwood.

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## 6. Summary

- 6.1 RS2 Properties Ltd is presenting the Council with a site that is capable of delivering between 21-46 dwellings, within a sustainable location. The site is suitable, available, achievable within five years, is in a highly sustainable location and performs a low contribution to Green Belt purposes given its containment by existing development on three of its boundaries.
- 6.2 The site and its promoter meet the Governments aspirations and direction of travel in policy in terms of supporting the delivery of much needed small and medium sites to boost significantly the supply of housing and provide choice and competition as required by the NPPF, and which has been reinforced by the revised NPPF.
- 6.3 This site is more sequentially preferable than many of the proposed allocations within the Preferred Site Allocations, including those sites proposed for release from the Green Belt. Notwithstanding this, it is considered that additional smaller sites need to be allocated to allow for flexibility in the Council's housing supply; and that the Council's OAN may need to be reconsidered in light of the proposed Standard Method for calculating housing supply.
- 6.4 We therefore urge you to recognise the Governments strategy and allocate the land at 41 Shenfield Road, Brentwood, Essex, CM15 8EN for delivery of between 21-46 dwellings in the first five years of the Plan period.
- 6.5 Please record this letter as a formal submission towards the emerging Local Plan evidence base and drafting stages.
- 6.6 We would welcome the opportunity to discuss the site further with Planning Officer's and Members.

## **APPENDIX 1 – Site Location Plan**



Revisions .

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All dimensions to be checked on site and any discrepancies reported to the Architect

All construction to be carried out in accordance with all relevant British Standards and Codes of Practice

**DO NOT SCALE THIS DRAWING**

Project 41 Shenfield Road  
Brentwood  
Essex

Drawing Location Plan

Drawn mkk

Scale 1:1250 @ A4

Date November 2017

**enplage**  
EMPTAGE ARCHITECTS

**WORK IN PROGRESS**  
**PRELIMINARY ISSUE - 1 03/11/2017**

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## **APPENDIX 2 - Call for Sites Representation 24th November 2017**





# Phase 2

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Senior Policy Planner  
Brentwood Borough Council  
Town Hall  
Ingrave Road  
Brentwood  
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CM15 8AY

23 November 2017  
Our Ref: C17102

Dear Jonathan

## **Site at 41 Shenfield Road, Brentwood, Essex, CM15 8EN**

Further to my email to you dated the 3rd November 2017 in respect of the above site I write to highlight the merits of this site for removal from the Green Belt and allocation for housing in the emerging Local Plan.

I would be grateful if you would record the contents of this letter as a submission towards the emerging Local Plan and update the Council's evidence base and records accordingly.

I confirm that we have also made a submission using the Council's online HELAA form.

My client, RS2 Properties Ltd, is seeking to promote the land through the Local Plan process for allocation of up to 30 dwellings. I attach a site location plan which includes the dwelling at No.41 Shenfield Road, which is sited within the residential area and outside the Green Belt, the site also includes the land to the rear of this dwelling that falls within the Green Belt but abuts the residential area on its southern, western and eastern boundaries.

I set out below considered evidence that this site should be allocated within the emerging Pre-Submission Local Plan.

The starting point of the draft Preferred Options Local Plan is Policy 5.1 Spatial Strategy, which seeks to: (a) focus growth around Brentwood; (b) release Green Belt to meet housing need; (c) only release sites that have clear defensible Green Belt boundaries (i.e. meet the tests of paragraph 85 of the NPPF) to avoid sprawl; and (d) provide housing swiftly in the Plan period.

The site is located 1.55km from Brentwood's centre and its rail station with footway provision and on a route with regular bus services to the centre of the town and 1.3km from Shenfield's train station. The site is therefore highly accessible to both Brentwood's and Shenfield's centre and sustainably located. The development of the site would focus development around Brentwood and is consistent with (a) above.

The Council recognises the need to release Green Belt land to meet its Objectively Assessed Housing Needs and that urban land is a finite resource. The draft Local Plan proposes to release Green Belt land in locations, which perform a much stronger Green Belt function than the subject site and therefore releasing this land would be consistent with (b) above.

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**Directors:** Kevin Coleman BSc (Hons) DipTP MRTPI  
Trevor Dodkins BSc (Hons) DipTP MRTPI



**Registered Office** Wingham's House, 9 Freeport Office Village, Century Drive, Braintree, Essex, CM77 8YG. Reg in England No 7796227

In respect of the sites Green Belt function, we believe that the site would form a natural small scale extension bounded on three sides by existing boundaries/edges of the residential built up area. Furthermore, we consider that the overall contribution of the site to Green Belt purposes is Low to moderate impact.

Therefore in light of the above, the removal of the site from the Green Belt for housing development would not conflict with (c) above.

In addition, the site is Suitable, Available and Achievable for residential with a net capacity of up to 30 dwellings for development within 1-5 years, without constraint and could be delivered early in the Plan period. The site is also very sustainable and out performs a significant number of the draft allocated sites.

Therefore the evidence is positive towards removal of the site from the Green Belt and allocation for housing development and has been found without constraint that could deliver housing swiftly in the first years of the Plan period and would be consistent with (c) above.

The Council has focussed on releasing strategic sites to the detriment of considering smaller sites such as this, this approach is short-sighted and out of step with national guidance and Government Ministerial Statements, the Planning White Paper and most recently the Budget announcements and accompanying consultation documents. We therefore believe that this site should be allocated within the Local Plan for housing for reasoning that I highlight below.

Firstly, there is the requirement of paragraph 47 of the NPPF which in seeking to 'boost significantly' the supply of housing local planning authorities should, among others, 'ensure choice and competition in the market for land' i.e. boosting provision of housing from a variety of sources, which would include small sites suitable for smaller housebuilders.

The Preferred Option Local Plan has an unfair bias towards larger and strategic sites in new allocations with only a small representation of sites available for less than 50 dwellings. This will not assist with planning to boost significantly the supply, increase the speed in delivery which comes with smaller less constrained sites, and will not 'ensure choice and competition in the market for land' by excluding small house builders from entering the market in Brentwood and leaving those house builders with no choice but to pursue windfall sites, which largely displace existing uses. This also provides aspiring homeowners with limited choice. This is therefore an unsavoury situation when there are sites such as the subject site at Shenfield Road available and suitable for housing that would ensure choice in the local housing area.

The lack of availability of land for small housebuilders is not just a local issue. A survey by the Federation of Master Builders in 2016 found that 67% of SME house builders in England face a "lack of available and viable land" as their biggest problem for the second consecutive year.

The National House Building Council (NHBC) stated that small- and medium-sized companies, defined as those building fewer than 500 properties per year, built two thirds of new homes in the late 1980s but evidence illustrates that many of these companies were pushed out after the housing crash in 2008 and never returned to the market: just 26% of homes are now built by SMEs, down from 44% in 2008. NHBC data suggest that there have not been further falls in recent years of the number of SME builders, but there is no sign of a resurgence of them.

The House Builders Federation (HBF) have recently released evidence confirming that over the past 25 years the number of SME builders has reduced by circa 80%, but just getting back to the number operating in



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2007 could produce an additional 25,000 homes a year nationwide. The HBF have produced a number of measures to assist with achieving this and the main one is making small sites available through the Local Plan process to enable SME builders to secure land.

Shenfield Road is case in point. This is a constraint free piece of land that could deliver up to 30 houses for a local Brentwood based house builder, which will otherwise have to compete for available urban land most likely with a current use that requires displacement.

Last year the Government announced a £3 billion house building fund targeted at small and medium-sized developers to get them building given the significant contribution they make to supply and market choice. This further illustrates the Government's commitment to assist smaller house builders but it again does not free up the land that is required to deliver the homes required.

We therefore submit that the emerging Local Plan must increase the number of small sites allocated to 'ensure choice and competition in the market for land' i.e. boosting provision of housing from a variety of sources, in accordance with paragraph 47 of the NPPF.

Secondly, the Government's recent publication of the Planning White Paper indicates the direction of travel for situations such as this.

Paragraphs 3.5 and 3.6 of the White Paper states:

*"3.5 Small builders have been declining and were hit hard by the recession. The number of homes registered by small builders is down from 44,000 in 2007 to 18,000 in 2015 demonstrating the potential for growth.*

*3.6 The Government will help this sector to grow and develop again. Small and medium-sized housebuilders regularly cite land, planning and finance as the major barriers to expansion."*

The remainder of the document explains how the Government will achieve this. Annex A55 in particular states that:

*"A.55 In addition, we are proposing some further changes to promote a good mix of sites and increase the supply of land available to small and medium-sized housebuilders – something that will help to diversify the housebuilding sector and encourage more competition. These changes would:*

- *make clear that on top of the allowance made for windfall sites, **at least 10% of the sites allocated for residential development in local plans should be sites of half a hectare or less;**"*

The Chancellor also announced this week in the Budget that there is support to increase this to 20% of sites allocated.

The Government is therefore firmly committed to support the delivery of sites such as the land at 41 Shenfield Road and it will soon become a requirement on the Council to ensure that its Local Plan allocates at least 10% of sites like this, potentially up to 20%, to assist with diversifying the building sector, encouraging competition and swift delivery of housing.



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Thirdly, the Council's current housing allocations is a strategy of just enough to meet its OAN and does not build in sufficient flexibility for delay and under delivery of the current draft allocations. It is therefore considered appropriate to plan for contingency and build in additional sites such as the subject site.

## Summary

Therefore, in summary Emptage Architects is presenting the Council with a site that is capable of delivering 30 dwellings in a sustainable location. The site has been found to be suitable, available, achievable within five years, is in a highly sustainable location and performs a low to moderate contribution to Green Belt purposes given its containment by existing development on three of its boundaries.

The site and its promoter meet the Governments aspirations and direction of travel in policy in terms of supporting SME house builders deliver much needed small and medium sites to boost significantly the supply of housing and provide choice and competition as required by the NPPF.

We therefore urge you to recognise the Governments strategy and allocate the land at 41 Shenfield Road, Brentwood, Essex, CM15 8EN for delivery of 30 dwellings in the first five years of the Plan period.

Please record this letter as a formal submission towards the emerging Local Plan evidence base and drafting stages.

We would welcome the opportunity to discuss the site further with Officer's and Members.

Please contact me should you require any further clarification.

Yours sincerely

**Michael Calder BSc(Hons) Dip TP MRTPI  
Director**

[mcald@phase2planning.co.uk](mailto:mcald@phase2planning.co.uk)

Telephone: 01376 329059

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