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LOCAL PLAN CONSULTATION - Local Plan Regulation 19 Representation.  
Planning Policy Team  
Brentwood Borough Council  
Town Hall  
Brentwood Essex  
**CM15 8AY.**

Dear Sirs

**RE: SOW N GROW NURSERY AND ADJOINING SITES MAKING UP SITE R07.  
BRENTWOOD DISTRICT LOCAL PLAN SUBMISSION DOCUMENT.  
CONSULTATION RESPONSE FOR MR DEKEK ARMIGER,** [REDACTED]

I am instructed as Agent by Mr Derek Armiger, and also the Armiger family by way of separate Responses, as being the joint owners of the larger part of the land comprising the Sow N Grow Nursery Allocated Site and Bungalow and dwelling, as defined in Policy R07, and as shown in part, on the plan on page 324.

Please find enclosed a completed Response Form on behalf of Mr Derek Armiger together with a continuation and supporting Statement of Response to the Local Plan which with this letter comprise the Response to the Consultation.

The Statement sets out the background to the inclusion of the site in the Submission Local Plan, and includes reference to pre-application advice taken with regard to the land owned by the Armiger family, their purchase of further freehold land under the former telecoms mast operated by O2 and formerly owned by Pinnacle Towers, to complete their assembly of their site.

There is also a reference to the potential development of the land they own within the Allocated Site (R07) by way of a scheme showing 42 dwellings as previously submitted to and commented upon by the Local Planning Authority in the pre-application advice process. (See Appendix 2 to the Response Statement).

The Response confirms that the whole of the land south of the trackway to the allotments is owned by Armiger family members. It is considered to be previously developed land. It is currently within the defined green belt. There are exceptional circumstances for a boundary change. There are short term tenants occupying the commercial buildings and the dwellings in their ownership are occupied by the Armiger family or by residential short term tenants.

Their part of the site is therefore readily capable of being made available for development for residential use within the first five years of the development plan period. Mr Armiger has undertaken some property development in the past and could undertake the development with his family as their own project or enter into an agreement to develop or sell, as may be appropriate. It is their firm intention to develop the land and this is confirmed by their expenditure on pre-application discussions and initial designs for the site as well as their recent land purchase.

As a smaller site with potential for build out by smaller local builders in the early part of the Plan period this Allocated Site will provide housing delivery in the early part of the Housing Trajectory pending larger site allocations coming forward in due course, but where infrastructure investments are required. See part of Policy SP02A which states:

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*“Provision is made for 7,752 new residential dwellings (net) to be built in the borough over the Plan period 2016-2033 at an annual average rate of 310 dwellings per year to 2022/23, followed by 584 dwellings per year from 2023/24-2033”.*

The Response Statement further confirms their part of the site is to the south of, and limited by a trackway running approximately east/west, giving allotment holders access to the back-land allotments. This trackway is not in their ownership nor is it in the ownership of Mrs Heather Dunbar the owner of the land comprising the remainder of the Allocated Site to the north of the trackway.

Mrs Dunbar has also instructed me separately as Agent to respond positively to the allocation in the Plan. The land allocated in the Sow N Grow Site owned by Mrs Dunbar comprises part of the garden to Rose Cottage, 346 Ongar Road, Pilgrims Hatch. The Statement to the Response confirms this.

The Local Planning Authority has taken some considerable time to prepare and produce this Submission Copy Plan, and following the change in National Planning Practice Guidance by Sir Eric Pickles, pre-application advice matters have been left in abeyance for some years. Until there is certainty and the adoption of the Local Plan including the Allocated Site in Policy R07 the Armiger family are not able to re-commence pre-application discussions and advice.

It is an important and material consideration for the site and the Plan to be adopted to deliver housing in the Brentwood area as early as possible and the allocation of this site can achieve this.

The Statement sets out why the Local Plan is considered to fully meet the requirements and criteria for the adoption of a Local Plan for the Examination in Public. The Statement refers to case law for Local Plans, particularly with regard to green belt boundaries. Plans do not have to be ideal or perfect in all respects. Some minor suggestions are submitted for the Examiner's discretion.

The earliest adoption of the Plan is supported and would be welcomed. It is supported by all the Armiger family and the adjacent owner, Mrs Dunbar, with the Sow N Grow site R07 included in it; without significant amendment. The Plan is considered to be the result of up to date pro-active plan making, based upon firm evidence and analysis, accords with the National Planning Policy Framework (and the Housing Delivery Test) and legally compliant. It is therefore sound.

Furthermore the Local Plan is considered to now have a comprehensive evidence base to fully and properly review all available brownfield/ previously developed land for future development, both within, and without the defined settlement boundaries of the District and in the Green Belt.

The inclusion of the Sow N Grow Nursery and land adjoining as shown in the Plan on page 324 is a clear example of these matters being achieved, with a readily developable and sustainable site being allocated in response to the Call for Sites, the Brownfield Register and the Consultations.

It is understood that at the Council Meeting in November 2018 the Councillor objecting to the inclusion of the Allocated Site withdrew objections.

The Plan is therefore supported for the earliest adoption and it is trusted that this Letter, the Response Form, and Supporting Statement submitted for Mr Derek Armiger are brought to the Examiner's attention. Mr Armiger would like to attend the Examination in Public in due course.

I should be pleased to discuss matters arising from this Letter, Response Form, and Statement, with the Local Planning Authority should it wish to do so.

Yours sincerely

Alan Wipperman BA MRICS MRTPI C Dip AF

Copies: Mr D Armiger.