



Phase 2

Response to Brentwood Borough Council Pre-Submission Draft Local Plan (Regulation 19) Consultation

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

Land south of Hook End Road, Hook End, Brentwood, Essex, CM15 0HA

On behalf of
Mr Terry Haynes

March 2019

Our ref: C19048

Phase 2 PLANNING & DEVELOPMENT LIMITED

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1. Introduction & Background

Introduction

- 1.1 This Regulation 19 Local Plan representation has been prepared by Phase 2 Planning and Development Ltd on behalf of Mr Terry Haynes, on behalf of the freehold owner of the subject site on land south of Hook End Road, Hook End, Brentwood, Essex, CM15 0HA as outlined by the Site Location Plan included at Appendix 1.
- 1.2 This submission is made under the Provisions of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations (2012) and relates to the following sections of the Council's Pre-Submission Draft Local Plan:

- **Section 4: Managing Growth**

Specifically Policy SP02: Managing Growth

- **Section 9: Site Allocations**

Representation summary

- 1.3 In summary, the landowner wishes to highlight the sustainability of the proposed site south of Hook End Road, Hook End, Brentwood, Essex, CM15 0HA (as illustrated by the Site Location Plan included at Appendix 1) to deliver much-needed new rural housing for Hook End enhancing its vitality. Please see the remainder of this supporting statement for further consideration in support of the subject site's inclusion in this emerging Local Plan strategy.

2. Soundness

- 2.1 As the attached representation form confirms the landowners representations relate specifically and solely to the soundness of the draft Submission Local Plan in respect of being positively prepared, justified, effective, and consistent with national policy in relation to the following sections of the emerging Local Plan:

- **Section 4: Managing Growth**

Specifically Policy SP02: Managing Growth

- **Section 9: Site Allocations**

Soundness

[Section 4: Managing Growth](#)

Draft Policy SP02: Managing Growth

- 2.2 Although on the whole it is generally considered that the Council's Pre-Submission Local Plan is sound there is some concern that the Council's Housing Requirement is not fully robust.
- 2.3 Planning Practice Guidance (PPG) on 'Housing and economic needs assessment', which was updated on the 20th 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.
- 2.4 Paragraph 4.13 of the Council's Pre-Submission Draft 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.
- 2.5 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) with this assessment confirming 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 fully sound on this basis.
- 2.6 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.

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- 2.7 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.
- 2.8 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.
- 2.9 With regards to Strategic Policy SP02, therefore, it is not considered that the Brentwood Local Plan—Pre-Submission Document can be considered to be robustly sound as, in accordance with paragraph 35 of NPPF3, the Plan is not fully 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 in full as it will not, as a minimum, meet its objectively assessed needs.

[Section 9: Site Allocations](#)

- 2.10 The sites that the Borough Council have identified for residential development are detailed at Chapter 9 of the Pre-Submission draft 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).
- 2.11 Accordingly, should the Inspector agree with our assessment that Brentwood's housing requirement is not fully sound, and the housing requirement thus increases, it would therefore be necessary to identify additional sites for allocation.
- 1.4 The following section of this representation provides support for land south of Hook End Road, Hook End, Brentwood, Essex, CM15 0HA, to be allocated for residential development.
- 1.5 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 fully agree with. The Council's calculations of when sites will be delivered, and how many dwellings will be delivered each year, appears ambitious.
- 1.6 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.
- 1.7 This level of growth from such a strategic allocation does not appear realistic and no evidence has been put forward to date to support this forecast. 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).

- 1.8 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.
- 1.9 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.
- 1.10 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.
- 1.11 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.
- 1.12 Furthermore, it is considered that the Local Plan is not entirely sound as it does not comply fully with paragraph 68 of the National Planning Policy Framework (NPPF3) (February 2019).
- 1.13 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.
- 1.14 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.
- 1.15 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.

- 1.16 Accordingly, it is considered that, as identified above with the Dunton Hills Strategic Allocation, that a greater percentage of smaller sites (such as land south of Hook End Road) should be identified for allocation.
- 1.17 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.

Necessary modifications to make the Pre-Submission Draft Local Plan robustly sound

- 1.18 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

- 1.19 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 agrees 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.
- 1.20 Furthermore, the Local Plan does not allocate a sufficient number of 'small sites' to contribute towards the housing requirement, as per paragraph 68 of NPPF3.
- 1.21 It is considered that land south of Hook End Road, Hook End, Brentwood, Essex, CM15 0HA is an appropriate site for residential development and should be allocated for appropriate new residential development.
- 1.22 The site itself includes land directly south of Hook End Road which would continue the existing pattern of ribbon development in this location as well as extend south comprising a logical and well-contained urban extension to the village with existing residential development already neighbouring the site on 3 sides. Despite this the subject site still remains of a greenfield nature situated within the Metropolitan Green Belt.
- 1.23 Although noted that Hook End is proposed to be classified as a smaller village within the Borough's Settlement Hierarchy the importance of allocating appropriate growth throughout the Borough cannot be underestimated. The subject site itself would be well-placed to assist in enhancing the vitality of this rural community allowing the village to grow and thrive, especially where there are groups of smaller settlements, with development in one village able to support services in villages nearby as advocated by para 78 of NPPF3. This is particularly

relevant in this instance given Hook End's physical relationship to the nearby villages of Stondon Massey, Doddinghurst and Wyatts Green as well as the village of Blackmore which itself includes some planned growth under the current Local Plan strategy.

- 1.24 Importantly NPPF3 also highlights at para 84 that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. It adds at para 103 that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- 1.25 Brentwood Borough Council published parts 1 & 2 of its Green Belt study in January 2018. These initial parts showed Hook End Road lying on the southern edge of 'Parcel 49a Stondon Massey and Hook End'. The report when assessing the parcel as a whole, confirms that it makes a 'moderate' overall contribution to Green Belt Purposes.
- 1.26 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.
- 1.27 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 rural area of Hook End and is well contained by existing built development and mature trees. Development would be seen as a logical extension to the physical extent of the village 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 Hook End and nearby villages. Such countryside separation would be retained.
 - **Purpose 3: to assist in safeguarding the countryside from encroachment:** The site has no specific countryside function and would utilise a well-contained parcel of land surrounded by residential development.
 - **Purpose 4: to preserve the setting and special character of historic towns:** The site has no physical relationship with any historic town.
- 1.28 Accordingly, it is considered that the site is suitable to be released from the Green Belt.
- 1.29 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 Hook End Road, including:

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- 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).

- 1.30 Those sites listed above are located within villages and the rural area comparable to that at Hook End Road.
- 1.31 Accordingly, we would request that the Local Plan be modified to allocate land south of Hook End Road for appropriate new residential development in line with the prevailing character and density of neighbouring residential areas.

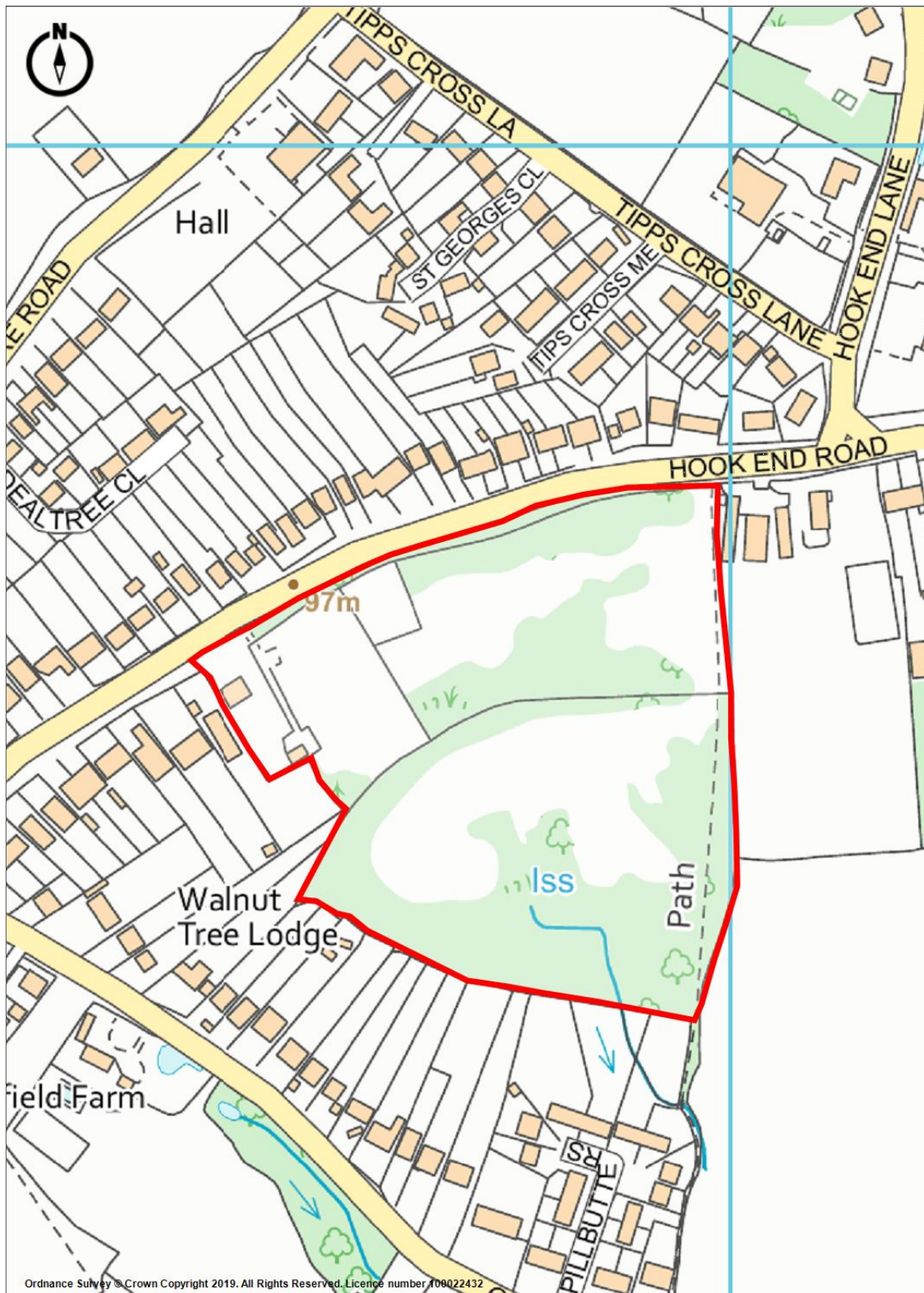
Conclusions

- 1.32 Based on the information set out above, it is considered that the inclusion of the subject site within the Council's proposed housing growth strategy or as an alternative reserve site would be sustainable and fully deliverable early within the Local Plan period, improving the overall soundness of the emerging Local Plan itself.
- 2.12 The possible low density nature of the allocation gives scope to provide a sensitively designed scheme which can be designed to integrate within and enhance the existing landscape having appropriate regard to local features and surrounding land uses, including existing neighbouring residential development.
- 2.13 Subsequently, the landowner contends that the relevant sections of the emerging Local Plan referred to within would be sound but could be improved further with the inclusion of this site ensuring the emerging Plan is **positively prepared, effective and justified**, and would be fully **consistent with national policy** including 'boosting significantly' the delivery of new homes within a borough that is heavily constrained by the Metropolitan Green Belt.

3. Participation at Hearings

- 3.1 The landowner reserves the right for them or their representative to participate at the associated Local Plan hearings (Examination in Public (EiP)) in relation to this emerging Local Plan process.
- 3.2 This may be necessary to provide continued support for the inclusion of land south of Hook End Road, Hook End, Brentwood, Essex, CM15 0HA within the emerging Local Plan's proposed housing growth strategy helping to secure its residential allocation.

Appendix 1





Phase 2

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