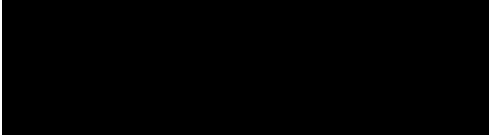


Planning Policy  
Brentwood Borough Council  
Town Hall  
Ingrave Road  
Brentwood  
Essex  
CM15 8AY



2<sup>nd</sup> October 2013

Dear Sirs

**Brentwood Local Plan 2015 – 2030 Preferred Options Consultation – Representation in relation to land at West Horndon**

I write in relation to the above named consultation on behalf of my client The Croll Group, who own the land outlined in red on the enclosed plan. I also enclose a copy of the completed proforma, as required.

The purpose of this letter is to provide Brentwood Borough Council with my client's comments on the above consultation in relation to the following proposed policies:

1. S1: Spatial Strategy
2. S2: Amount and distribution of residential development
3. CP1: Sustainable development
4. CP3: Strategic sites
5. CP4: West Horndon Opportunity Area
6. CP10: Green Belt
7. DM11: New Development in the Green Belt
8. DM23: Housing Land Allocations – Major sites

The letter is structured to provide details of the site in question, followed by subheadings taken from the relevant policies set out above which are used to address my clients' comments. A summary of the key concerns raised will conclude the letter.

### **The Site**

The site extends to approximately 0.829 hectares or 2.05 acres and is currently rough scrubland located to the immediate north of Station Road in West Horndon. Well bounded to the north and south with mature trees and hedgerow, there is an existing access provided direct onto Station Road from the south of the site. To the east is a housing estate comprising of Petresfield Way leading on to Sanderson Close, the boundary between the two denoted by close board fencing. To the west and to the north beyond the tree belt, is the Horndon Industrial Park. The West Horndon train station is approximately 150 metres from the site access.

Within the Brentwood Borough Council Preferred Options Local Plan, Horndon Industrial Park has been allocated as a mixed use site with the provision for 1,500 dwellings. A copy of the proposed allocations plan is enclosed for your convenience. This clearly shows the extent of the allocation which is up to the northern and western boundaries of my client's site, with a sizeable Green Belt release proposed to the north. In effect the site is surrounded by land which is developed or proposed for development and it therefore creates an anomaly that there are no proposals to bring this site forward.

### **S1: Spatial Strategy**

This policy aims to protect the Green Belt by focusing new development on land within accessible settlements, along with the redevelopment of sustainable sites in the Green Belt. This specifically includes a strategic allocation at West Horndon.

Although this strategy is not in question, I would query the rationale behind the exclusion of my client's landholdings given its location in relation to the West Horndon strategic allocation.

### **S2: Amount and distribution of residential development**

The Borough is proposing to provide for 3,500 new dwellings within the plan period between March 2015 and March 2030 with 1,500 new dwellings within West Horndon. Peter Bret Associates Objectively Assessed Need Report, which has been undertaken but not published by the Council, suggests a figure requiring up to 362 new homes to be built per year; or 5,430 new dwellings over the plan period. This illustrates a shortage in housing numbers over the plan period of 1,930 or 128 dwellings a year.

It should also be noted that the Council's Strategic Housing Market Assessment (SHMAA) has not yet been finalised and published, which in my opinion makes it difficult to provide comprehensive comments on the plan when all of the facts are not available to evaluate. The National Planning Policy Framework (NPPF) at paragraph 159 states that Local Authorities should have a clear understanding of housing needs and prepare a SHMA to assess their full needs over the plan period which meets population projections.

### **CP1: Sustainable Development**

This preferred policy states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. Although this approach is not questioned, it is assumed that my client's landholdings are considered sustainable when evaluated against the West Horndon strategic allocation. Therefore the exclusion of this land in such a sustainable location, and when it would appear from the objectively assessed need report that there is a shortfall in housing supply, seems in my opinion to be an anomaly that is not justified within any of the evidence base documents provided or the Local Plan itself.

### **CP3: Strategic sites**

This preferred policy allocates the West Horndon site for mixed use development and demonstrates the location of my clients' land in relation to the strategic allocation. The evidence based identified for this allocation is detailed as being the Sustainability Analysis and the Site Analysis pro formas. In my opinion, this is not sufficient evidence on which to base an allocation and the plan does not therefore sufficiently consider the reasonable alternatives as required by the NPPF at paragraph 158; in particular my client's site, given its sustainable location and relationship to the West Hordon Opportunity Area.

### **CP4: West Horndon Opportunity Area**

The proposed policy states that there may be an opportunity to expand the area for development dependent on the ability to accommodate a self-sustaining community. It would appear that this policy is based on an infrastructure delivery plan and modelling work which have not yet been finalised. Again I therefore find it difficult to provide comprehensive comments without a complete evidence base.

Having reviewed the Brentwood Local Plan 2015-2030 Preferred Options West Horndon Opportunity Area Supporting Document (August 2013) it would however appear that my clients' land has been discounted from allocation with no justification provided within this document or the evidence base as to the reason for the exclusion. Again I believe the requirements of the NPPF at paragraph 159 relevant, stating that Local Authorities should have a clear understanding of housing needs and prepare a SHMA and a SHLAA to assess their full needs over the plan period in order to meet population projections.

### **CP10: Green Belt**

The proposed policy includes provision for minor amendments to the Green Belt, where new development has the effect of consolidating settlement patterns so as to create a defensible boundary. Taking this provision into consideration in order to completely regularise the settlement pattern of West Horndon and ensure there are no anomalies which cannot be justified, it is my opinion that my client's site should be allocated for development within the West Horndon Opportunity Area. This would follow the current precedent of allocating Green Belt land within this location of the Borough for development.

### **DM11: New Development in the Green Belt**

The Council are proposing that the preferred policy will have regard to:

- maintaining the openness, function and permanence of the Green Belt.
- protection of the general character and appearance of the rural area.
- the effect of the proposal on public rights of way.
- whether the proposal will diminish or support peoples quiet enjoyment of the countryside.
- the need to preserve or enhance existing landscape and ecological features when assessing proposals for new development in the Green Belt.

If these criteria are used to evaluate my client's landholdings, given its current Green Belt allocation, it can be demonstrated that:

- This land is not open given it would be completely surrounded by development and will have no function as Green Belt.
- The area is not rural in character or nature given the proposed allocation so its protection, in my opinion, would not be a consideration.
- There are no public rights of way affected.
- The site provides a buffer between the Industrial Park and the residential properties at Petresfield Way and Sanderson Close but this could not be considered countryside given the allocation which will virtually surround the site.
- There are no features of landscape of ecological value on the site which could not be preserved as part of any forthcoming scheme.

### **DM23: Housing Land Allocations – Major sites**

For the reasons provided above, it is my opinion that this policy should be updated to include my client's landholdings in order to assist with meeting the objectively assessed needs of the Borough and to demonstrate a sound spatial growth strategy has been adopted. This would also provide additional flexibility in the number of dwellings which could come forward if a self-sustaining community is established in this location, in line with proposed policy CP4.

### **Summary**

The NPPF paragraph 47 states that *'to boost significantly the supply of housing, local planning authorities should:*

- *ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; and*
- *Identify key sites which are critical to the delivery of the housing strategy over the plan period; and identify a supply of specific, developable<sup>12</sup> sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15*
- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period'.*

In relation to the three requirements of the NPPF as set out above, I believe that this letter has demonstrated the following:

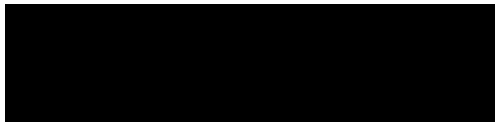
- The Council are not meeting their objectively assessed needs given the recommended figure within the Peter Bret Associates Objectively Assessed Need Report, which recommends a figure of up to 362 new homes a year, rather than the 233 dwellings currently proposed.

- A proportionate evidence base as per paragraph 158 of the NPPF has not been used to identify sites which are critical to the delivery of the housing strategy. This is demonstrated through the lack of a SHMA and due to the lack of commentary on my client's site given its relationship with the proposed West Horndon allocation.
- Given the above two considerations, I believe it would be fair to assume that the housing trajectory is unlikely to be an accurate reflection of the expected rate of housing delivery.

To conclude, my client objects to the plan on the basis that there has not been sufficient evidence provided to accurately assess the housing figures required by the Borough and that there is no commentary provided either within the Preferred Local Plan or any of the evidence base documents that offers justification as to why my client's site has not been considered for development.

If you have any questions regarding this representation please do not hesitate to contact me on my clients' behalf.

Yours sincerely,



**VICTORIA OAKLEY MSc MRTPI**  
**Senior Planner**

Enc Red Line Plan  
Extract map from Individual Site Allocation Maps  
Brentwood Borough Council Completed Proforma

Cc: Derek Croll – The Croll Partnership  
Paul Fosh – Strutt and Parker