

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 to the south of Lodge Close, Hutton, Shenfield**

I write in relation to the above named consultation on behalf of my client The Chelmsford Diocesan Board of Finance, who own the land outlined in red on the enclosed plan.

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. S2: Amount and distribution of residential development
2. CP1: Sustainable development
3. CP10: Green Belt
4. DM11: New Development in the Green Belt
5. DM21: Preservation and Enhancement of Conservation Areas

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 client's comments. A summary of the key concerns raised will conclude the letter.

### **The Site**

The site is located within the village of Hutton which is approximately 2 miles from Shenfield and 2.8 miles from Brentwood. There are a number of services and transport links which include a regular bus service to a number of surrounding settlements including Shenfield and Brentwood. Located to the west of the road known as 'Hutton Village' the site extends to 1.3Ha and is suitable, available and achievable in development terms. Adjacent to existing residential uses to the north, the site is well related to the built form of the village. There is an existing access to the site from Hutton Village, the main adjoining public highway.

The Brentwood Replacement Local Plan (2005) identifies the site as being within the Green Belt and within the Hutton Village Conservation Area, more than 500 metres from Hutton Hall.

The site is identified within the Atkins Global 2011 Strategic Housing Land Availability Assessment as suitable, available and achievable for development within the next 1 - 5 years, deemed to have potential for residential development.

## **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. 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 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 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 proposed allocations within the small site allowance that are taking place within Hutton. Therefore the exclusion of this land when it would appear from the objectively assessed need report that there is a shortfall in housing supply is not justified within any of the evidence base documents provided or the Local Plan itself.

## **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 the site is adjoining the settlement boundary of Hutton and is well defined with Hutton Village Road providing a defensible barrier between development and the Green Belt. Allocating this site would provide a natural rounding off the village settlement boundary.

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

In assessing proposals for new development in the Green Belt it is proposed that the Council will have regard to the following:

- the objective of maintaining the openness, function and permanence of the Green Belt
- the 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 people's quiet enjoyment of the countryside
- the need to preserve or enhance existing landscape and ecological features

Taking each of the above points in turn in relation to the site:

- The openness, function and permanence of the Green Belt would not be affected given that the Green Belt is compromised by Hutton Village Road, which dissects the fields. In general the character and openness of this area has been altered given the Hutton Court development, Hutton Hall, The Old Rectory and the other associated residential development within this area.
- As described above the nature of this area has been fundamentally altered and does not offer a rural feel, particularly given the proximity of the Lodge Close development. The general character and appearance of the wider area would be protected by the existing mature tree belt along the east and south site boundaries.
- Any proposals coming forward would take into consideration public rights of way.
- Propose the removal of point 'd' from the proposed policy wording as in my opinion this is ambiguous and difficult to quantify as it could be argued that all development on Green Belt is going to diminish quiet enjoyment of the countryside.
- There are a number of mature trees on site, which could potential be retained as part of any forthcoming proposals, particularly considering the Conservation Area status. The site's use as a paddock for intensive grazing is likely to significantly reduce the ecological features and potential on the site.

### **DM21: Preservation and Enhancement of Conservation Areas**

Given that the site falls within the Hutton Village Conservation Area and has been identified within the 2011 SHLA as a potential site for residential development, it is proposed that the site is listed within Appendix 2 of the Preferred Options Local Plan as a preferred allocation for small sites allowance. It is not clear from the evidence provided why my client's site was identified within the SHLAA as having development potential and then discounted without any further work being undertaken.

Given the Conservation Area status, this site offers the potential to bring forward development of a high standard and quality within Hutton.

### **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'.*

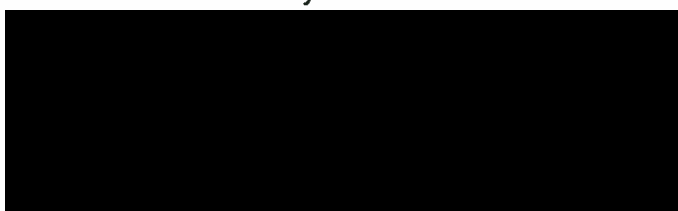
In relation to the three requirements of the NPPF as set out above, I believe that this letter has demonstrated the following:

- 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 to be built 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 an up to date SHMA and additional evidence regarding the exclusion of my client's site from Appendix 2 of the Preferred Options Local Plan.
- 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 the site was originally identified as having potential for development, before being discounted at Preferred options stage with no justification available for this decision.

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

Yours sincerely



**Senior Planner**

Enc. Red Line Site Location Plan  
Brentwood Borough Council pro forma

C.C. Anna Franklin – Property/Glebe Officer  
Paul Fosh – Strutt and Parker