

Brentwood Borough Local Plan 2015-2030 Preferred Options for Consultation

**Representations On Behalf of Countryside Properties
In Relation to Bayleys Mead, Hutton**

Our Ref: C13031

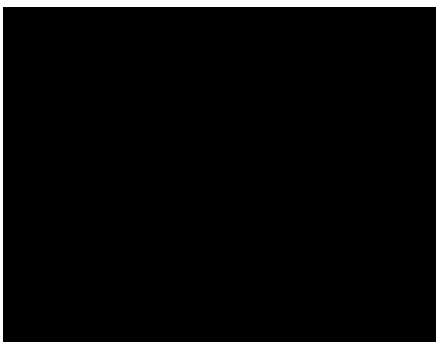
October 2013





Phase 2

PLANNING &
DEVELOPMENT
LIMITED



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Policy S1: Spatial Strategy

Summary: The spatial strategy is not founded on an ‘adequate, up-to-date and relevant evidence’ base and is therefore fundamentally flawed, failing to accord with the NPPF (paragraph 158). The Plan adopts an arbitrary approach to residential development by restricting development in the Green Belt rather than positively seeking opportunities to meet the development needs of the Borough. There is no comprehensive justification for failing to meet objectively assessed needs.

Despite identifying that the Borough cannot meet its own housing needs, the Council has failed to seek to meet those needs by cooperating with neighbouring authorities.

We have noted the response by Chelmsford City Council, agreed at their Development Policy Committee of 19 September 2013 (agenda item 70), which accords with our concerns, summarised as follows:

1. The City Council disagrees with Brentwood Borough Council’s Preferred Spatial Strategy which does not seek to accommodate its full housing need.
2. The City Council disagrees with Brentwood Borough Council’s approach of looking to neighbouring authorities to meet unmet need.
3. The City Council raises concerns regarding the deliverability of sites, such as the strategic allocations in West Horndon, identified for housing in the Preferred Options Local Plan.
4. The City Council objects to the Preferred Options Local Plan being published for public consultation prior to key relevant evidence base documents being made available.

Our specific representations are set out below.

Detailed Representation: The premise of the spatial strategy appears to be to protect the Green Belt around the two principal urban areas of Brentwood and Shenfield and that this overrides other requirements such as meeting ‘objectively assessed needs’ in accordance with the National Planning Policy Framework (NPPF). As set out in our representations to Policy S2, the starting point for establishing the quantum of residential development to be provided within the Plan period should to meet ‘objectively assessed needs’ in accordance with paragraph 14 of the NPPF. This was assessed by the Council (Alternative Option 1) and rejected on the basis that this level of growth (4,960 to 5,600 dwellings) “would require significant Green Belt release, significantly worsen congestion in Brentwood Town Centre and irrevocably change the rural character of the Borough.” It goes on to state that “significant investment in infrastructure and services would be required to support this level of growth and there is no guarantee this would be forthcoming.”

It is accepted that this level of development would require additional Green Belt release. Although this would alter the character of some areas of the Borough by changing parcels of land from rural to urban, none of the evidence base documents produced to date give a clear indication of the extent of Green Belt land required to meet needs relative to the Borough as a whole or an assessment on the impact of this level of development on the rural character of the Borough. Also in the cases of congestion, infrastructure and services it is not disputed that further development may well have an impact as additional homes and people will result in increased use of infrastructure, but again there

is no assessment of the extent of this impact and likely implications, and consequently it is difficult to respond with conclusions on how to quantify the impact. The Plan proposes to expand West Horndon with new infrastructure as part of the development, but does not make clear why the same approach cannot apply to other sites.

As many of the evidence base documents referred to in the Draft Local Plan are not currently available, it is not possible to assess whether the impact of meeting objectively assessed needs would “significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole” (NPPF, paragraph 14). The evidence base documents that are referred to in the Local Plan but are not publicly available during the consultation period include:

- Objectively Assessed Needs for Brentwood;
- Landscape Sensitivity Testing and Green Belt Assessment;
- Transport Modelling;
- Utilities Study; and
- SHMA update.

Evidence base documents should be prepared in advance of the Local Plan so that they can inform the Plan and its strategy. It is relevant to note that just two months prior to the current consultation period, the Council stated that housing will be provided at a rate of up to 362 dwellings per annum (source: Brentwood Local Development Plan Newsletter, Issue 1: June 2013). A month later this had been fixed at a reduced rate of 233 dpa (source: Brentwood Local Development Plan Newsletter, Issue 2: July 2013). Therefore only two months before the publication of the Preferred Options Document, there was no indication that the Council had evidence to adopt a different strategy at this late stage in the plan preparation process.

It is queried whether these documents were prepared in advance of the Local Plan or whether they are being retrospectively prepared to accord with the ‘revised’ strategy.

On the basis of the information available, it appears that the impact of increasing the amount of residential development delivered within the Plan period by including Green Belt sites identified as ‘suitable, available and achievable’ within the SHLAA has not been assessed. Rather than considering the impact of releasing Green Belt sites, both in terms of their individual and cumulative effects, it seems that, an arbitrary decision has been made to prevent further Green Belt release around Brentwood and Shenfield, the primary urban areas of the district.

We consider therefore that the Government will require more detailed assessment of alternative spatial strategies to justify one that discords with the NPPF.

The Plan identifies that the Council will work with neighbouring authorities in attempting to meet ‘objectively assessed needs’. The NPPF requires Local Planning Authorities (LPAs) to “work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans” (paragraph 179). The NPPF goes on to state that “joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas”. The Local Plan

states that the NPPF advises planning authorities to look to neighbouring authorities to meet unmet need, where they cannot meet this themselves, through a 'Duty to Cooperate' at para 2.21. It goes on to say that the Council is exploring options in this regard. The Plan as currently drafted fails to demonstrate that 'objectively assessed needs' can be accommodated within the Borough or the boundaries of neighbouring authorities and therefore the Duty to Cooperate has not been complied with and the Plan is unsound.

As detailed in our representation to Policy S2, we submit that sites such as our client's land at Bayleys Mead could make a positive contribution towards meeting housing needs without unacceptable impacts and as a result the spatial strategy should be changed to allow appropriate Green Belt releases.

Green Belt sites identified as having potential for development in the SHLAA should be considered for inclusion within the Plan with a consequential amendment to Green Belt releases in this policy.

Proposed Changes to the Plan: Policy S1: Spatial Strategy should be amended to change the word 'redevelopment' in the first paragraph to 'development'. The final paragraph should be deleted and replaced with the following wording:

"Amendments shall be made to the Green Belt to enable the following development:

- i. Strategic Allocation at West Horndon;
- ii. Allocation at land east of Bayleys Mead; and
- iii. Existing developed sites in the Green Belt."

Key Diagram (Figure 2.1)

Detailed Representation: The Key Diagram should be amended to show housing sites and the release of Green Belt land in accordance with representations and policies S1 and S2.

Proposed Changes to the Plan: The Key Diagram should be amended to show housing sites and the release of Green Belt land in accordance with representations and policies S1 and S2.

Policy S2: Amount and Distribution of Residential Development

Summary: The option chosen is contrary to the NPPF and therefore it is inappropriate as it fails to meet 'objectively assessed needs' and there is a lack of evidence to justify this approach. The Plan also fails to "positively seek opportunities to meet the development needs of their area" (NPPF). There is no evidence to support the selected level of residential development. Further sites should be considered that will help to meet the objectively assessed needs without resulting in adverse impacts that would "significantly and demonstrably outweigh the benefits" (NPPF, paragraph 14). Sites identified within the Council's SHLAA as being 'suitable, available and achievable', such as land at Bayleys Mead could contribute towards fulfilling this objective, providing residential development adjoining the urban area of Brentwood. This site should be allocated for development within the Plan period.

Detailed Representation: The starting point for establishing the quantum of residential development to be provided within the Plan period should to meet 'objectively assessed needs' in accordance with paragraph 14 of the National Planning Policy Framework (NPPF). This was identified as an option by the Council (Alternative Option 1) and then rejected on the basis that this level of growth (4,960 to 5,600 dwellings) "would require significant Green Belt release, significantly worsen congestion in Brentwood Town Centre and irrevocably change the rural character of the Borough." It goes on to state that "significant investment in infrastructure and services would be required to support this level of growth and there is no guarantee this would be forthcoming."

The Inspector's comments in the Gravesham Examination has made it clear that he is willing to allocate more GB land to meet what he sees as deficiencies in housing numbers. We are also aware of a number of cases where Inspectors have made clear that in terms of local constraints, authorities have been advised not to rely on highways constraints and/or landscape value to justify a lower housing target. And that the scale PINS were putting on highways considerations was very modest and the Government has placed a higher priority on building houses than the impact of delays on the road. Indeed, we understand that no LPA so far has managed to lower their housing target using highway/transport constraints as their primary argument.

Although it is accepted that this level of development would require additional Green Belt release, which would alter the character of some areas of the Borough by changing parcels of land from rural to urban, none of the evidence base documents produced to date give a clear indication of the extent Green Belt land required to meet needs relative to the Borough as a whole or an assessment on the impact of this level of development on the rural character of the Borough. Also in the cases of congestion, infrastructure and services it is not disputed that further development may well have an impact as additional homes and people will result in increased use of infrastructure, but again there is no assessment of the extent of this impact and likely implications.

As many of the evidence base documents referred to in the Draft Local Plan are not currently available, it is not possible to assess whether the impact of meeting objectively assessed needs would "significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole" (NPPF, paragraph 14). The evidence base documents that are referred to in the Local Plan but are not publicly available during the consultation period include:

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- Objectively Assessed Needs Assessment;
 - Landscape Sensitivity Testing and Green Belt Assessment;
 - Transport Modelling;
 - Utilities Assessment; and
 - SHMA update.

Evidence base documents should be prepared in advance of the Local Plan so that they can inform the Plan and its strategy.

It is relevant to note that just two months prior to the current consultation period, the Council stated that housing will be provided at a rate of up to 362 dwellings per annum (source: Brentwood Local Development Plan Newsletter, Issue 1: June 2013). A month later this had been fixed at a reduced rate of 233 dpa (source: Brentwood Local Development Plan Newsletter, Issue 2: July 2013). Therefore only two months before the publication of the Preferred Options Document, there was no indication that the Council had evidence to adopt a different strategy at this late stage in the plan preparation process.

It is therefore queried whether these documents were prepared in advance of the Local Plan or whether they are being retrospectively prepared to accord with the 'revised' strategy.

On the basis of the information available, it appears that the impact of increasing the amount of residential development delivered within the Plan period by including Green Belt sites identified as suitable, available and achievable within the SHLAA has not been assessed. Rather than considering the impact of releasing Green Belt sites, both in terms of their individual and cumulative effects, it seems that, an arbitrary decision has been made to prevent further Green Belt release around Brentwood and Shenfield, the primary urban areas of the district.

The Plan appears to place significant weight on people's strength or feeling about the protection of the Green Belt when surveyed. All of the Borough's countryside lies within the Metropolitan Green Belt and understandably it is considered to be an important asset by local people. However, seeking to meet objectively assessed needs would only result in the loss of a very small proportion of Green Belt land and therefore these general views about the importance of the Green Belt to the Borough have limited weight when considering limited Green Belt release as the majority of the Green Belt would be unaffected. It is essential that a more comprehensive assessment of Green Belt sites and the impacts of their development are taken into consideration.

With regard to our client's site, land at Bayleys Mead, The Council's Strategic Housing Land Availability Assessment (SHLAA) produced in 2011 recognised that this site is suitable, available and achievable and could deliver 105 dwellings (on a slightly larger site) during years 5 to 10. More detailed assessment, provided in the Draft Site Assessment document (July 2013) identifies that there are no insurmountable constraints to development, however this document concludes that this site (and other sites that were also accepted in the SHLAA) does not accord with the spatial strategy and therefore should not be allocated.

As identified above, the lack of an available evidence base and the reasons identified for the option selected is questioned. In the absence of available evidence, it is difficult to conclude whether a strategy that met objectively assessed needs would have an unacceptable impact in terms of Green Belt, congestion, rural character or infrastructure/services. However, an assessment can be made in relation to the impact of the development of our clients land at Bayleys Mead, having regard to these issues. Each of these issues is considered in turn below:

- i. Level of Green Belt release – Development of this site in isolation would only result in a small Green Belt release which would not compromise the identified purposes of Green Belt as a whole. The Borough has around 13,500 hectares of Green Belt and this site of 1.57 hectares represents less than 0.02% of the Green Belt.
- ii. Congestion in Brentwood Town Centre – This site is recognised in the Council’s SHLAA as being “within close proximity to a public transport route and services and facilities”. The impact of a small number of dwellings in this location, 4km from Brentwood High Street will have a minimal impact on congestion in the Town Centre.
- iii. Change to the Rural Character of the Borough – development of this site would have a negligible impact on the rural character of the Borough and is identified within the Council’s SHLAA as appearing “to be a natural extension to the existing residential area of Hutton and it is considered that development would have a minimal impact on the countryside.”
- iv. Investment in Infrastructure and Services – the Plan does not identify which elements of infrastructure/services would require significant investment should objectively assessed needs be met. However, in the case of Bayleys Mead, the SHLAA identifies that “the cost of connection to infrastructure and services and any developer contribution is likely to be in line with what would normally be expected for a site of this size”, and is therefore better than most locations.

Whilst the importance of the Green Belt is recognised, it is essential that the development of sites such as Bayleys Mead should be considered in the context of their contribution towards meeting the Borough’s objectively assessed housing need and not against an arbitrary decision to restrict development in the Green Belt.

A summary table setting out the Council’s assessment of this site with our updated comments accompanies this representation. This demonstrates that the site can make a positive contribution towards meeting housing needs, providing both private and affordable housing.

In light of the above, it is considered that the Plan is contrary to the NPPF and in particular paragraph 14 which provides clear guidance on plan-making, paragraph 47 which relates to the requirement to meet the full objectively assessed needs for market and affordable housing and the following Core Planning Principle:

“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.”

Proposed Changes to the Plan: Policy S2: Amount and Distribution of Residential Development 2015-2030 should be amended to increase the number of dwellings to be built in the Borough and include “Sites on the Edge of Brentwood and Shenfield Urban Area”. The number of dwellings should include 47 on land at Bayleys Mead and other appropriate Green Belt sites.

Policy CP2: Managing Growth

Representation: This policy requires a consequential amendment resulting from our representations to policies S1 and S2 to enable development of appropriate Green Belt sites.

Proposed Changes to the Plan: Policy CP2: Managing Growth should be amended to read as follows:

“The Council expects the majority of new development to be provided within or adjoining existing settlements, as identified on the Policies Map, through the development, conversion of previously developed land and buildings or release of appropriate Green Belt sites. In allocating sites...”

Policy CP3: Strategic Sites and Related Policies CP4 to CP7

Representation: Our comments on the strategy of the Plan are as set out in relation to draft policies S1 and S2 as above. In relation to the sites proposed by the Council under policy CP3, these sites are deemed strategic by the Council because they are deemed critical to delivering the Plan. Our response to other site specific allocations are set out below in relation to Development Management Policy DM23.

With regard to the proposed identification of West Horndon as a strategic growth location, this clearly involves a reappraisal of Green Belt boundaries and significant infrastructure investment, which conflicts with the constrained approach of the Plan in relation to Brentwood/Shenfield, and which therefore devalues the strategic approach of the Plan. The approach of the Plan should therefore be consistent with the approach taken at West Horndon. However, given the need for relocation of employment uses, together with the significant lead-in times to deliver new infrastructure of which Countryside Properties have particular experience, the trajectory suggestion that the site could deliver from 2017/18 is questioned given that the Plan will not be adopted until late 2014 at the earliest.

With regard to CP5 and 6, these both involve the redevelopment of existing commercial and retail premises, the latter of which was improved in 2005. There is no expressed commitment from landowners or information on how disruption to existing business will be minimised, and therefore we would be cautious about both the principle and potential delivery from these sites. The Baytree Centre appeared as an allocation in the previous Local Plan, and a recycling of such an allocation adds weight to whether the site can be delivered within the lifetime of the Plan. Indeed the trajectory suggests delivery from 2023 which highlights that this is a site that cannot be deemed to be realistically deliverable.

Although we propose no specific change to the Plan, if these sites are to be demonstrated to be robust and deliverable, then more information needs to be provided by the Council in justifying their inclusion.

Policy CP10: Green Belt

Representation: This policy should enable amendment to the Green Belt boundary in locations where sites have been identified in the SHLAA as being suitable, available and achievable as required.

Proposed Changes to the Plan: Policy CP10: Green Belt should be amended as follows:

“The general extent of the Green Belt across the Borough will be retained subject to allocations made in this Plan affecting Green Belt and where new development has had the effect of consolidating settlement patterns so as to create a defensible boundary.

The following settlements...”

Policy DM23 Housing Land Allocations – Major Sites

Representation: We attach a schedule with our comments attached as appendix 2 to this representation, which shows a brief assessment of each site. Many are Council owned therefore we have no comments on whether these could be deliverable from an ownership point of view, but we also note that many are residential parking/garage sites which as noted in the SHLAA, little information is provided on alternative parking arrangements if these site were developed.

As set out earlier in our response, in addition to the advice that authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, the NPPF is clear that the Council must identify a supply of specific deliverable sites with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. There is no evidence that the Council have adopted this approach.

In addition, with regard to windfalls, the NPPF advises that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

It is not clear that the windfall allowance has been justified against these criteria, and indeed we consider that given the small site allowance in appendix 2, then no windfall allowance should be made.

This policy should be amended to include land at Bayleys Mead in accordance with representations to policies S1 and S2, and the windfall allowance in appendix 2 removed.

Proposed Changes to the Plan: Inclusion of the following site:

“x. Land at Bayleys Mead (47 dwellings)”

Include plan showing outline of the site with blue wash (see attached).

Windfall allowance in appendix 2 removed.

Appendix 1
Site Summary Table

Land at Bayleys Mead - Summary Table

Site Details	Draft Site Assessment (BBC)	Further Supporting Details/Updated Position
Site Size	2.35	1.57
Ownership	Mr D Fisher (agent: The John Daldry Partnership)	Mr Fisher and Mr Chaplin
Indicative Number of Dwellings	117	47
Site Density	50dph	30dph
Land Use and Policy Designation		
Existing Land Uses	Scrubland with areas of woodland	
Neighbouring Land Uses	Surrounded by open fields, residential to the west	
Minerals and Waste Safeguarded Area	No	
Agricultural Land Classification	Grade 3	
Special Landscape Area	No	
Landscape and Visual Impact	LCA: F14 Ingrave and Herongate Wooded Farmland	
Local Wildlife Site/Nature Conservation	No	
Protected Urban Open Space	No	
Conservation Area	No	
Listed Buildings	No	
Scheduled Ancient Monuments	No	
Transport		
Access to main distributor road (ECC comments)	Access from Bayleys Mead is considered satisfactory	
Highway capacity of surrounding network	-	
Access to bus and train (approx.)	1.5 miles to Shenfield Station (approx. 30 min walk). Bus route 551 nearby, links to Brentwood Town Centre and station. Bus route 81 within walking distance, links to Shenfield	Bus stops on Hanging Hill Lane are 0.3km (approximately 4 minutes walk) from the site entrance. Buses provide regular links to Brentwood Station, Brentwood High Street and Shenfield, Shenfield Station and further afield to Billericay and Basildon. Shenfield station provides

		direct access to London Liverpool Street.
Walking and Cycling	-	
Access to Services		
Access to Post Office	1.5 miles to Shenfield centre (approx 30 min walk). Direct bus links within walking distance	
Access to GP (approx.)	1.5 miles to nearest GP (Mount Avenue, Shenfield). Approx 30 min walk, 5 min drive	
Access to employment (approx.)	1.5 miles to nearest employment site (Hutton Industrial Estate) (approx 30 min walk)	
Access to main retail area (approx.)	1.5 miles to Shenfield centre (approx 30 min walk), bus links within walking distance	
Education		
Capacity for pupil product to be accommodated at nearest primary school	No (requires safe/direct walking route)	Willowbrook School is located within 1.5km of the entrance of the site. Whilst it has a small amount of spare capacity, a contribution could be made so that the additional pupils could be accommodated if required.
Capacity for pupil product to be accommodated at nearest secondary school	No (not within 2km of nearest school by safe/direct walking route)	St Martin's School is located within 0.3km of the entrance of the site. Whilst it does not have spare capacity, a contribution could be made so that the additional pupils could be accommodated.
Utilities		
Water Supply	-	All services available
Gas Supply	63mm LP gas adjacent to southern boundary within the verge. May require localised diversions for new accesses	All services available
Electricity Supply	None	All services available
Oil and Gas	Not affected	
Telecommunications	-	All services available
Flood Risk		
Flood Zone	No	
Surface Water Flooding	Yes, area of less to intermediate susceptibility	No insurmountable drainage issues

	running through site	
Viability		
SHLAA: Potential?	Potential	
SHLAA: Suitable?	Yes. Appears to be natural extension to the existing residential area of Hutton and it is considered that development would have a minimal impact on the countryside. The site is within close proximity to a public transport route and services and facilities	
SHLAA: Available?	Yes. The site is available for residential development	This is confirmed. Countryside Properties.
SHLAA: Achievable?	Yes. Site is within an attractive residential area. Contamination issues are unknown. The cost of connection to infrastructure and services and any developer contributions is likely to be in line with what would normally be expected for a site of this size. Due to the size of the site it is likely to come forward via a national house builder	Assessment of contamination will be undertaken in due course, however there are no historic uses of the site which would indicate that contamination would be likely to be a problem.
Site Ownership and Legal Issues	No issues known	There are no ownership or legal issues.
Willingness of landowners and/or developers	No contact with landowner/agent since 2009 call for sites	There are no known constraints which may prevent bringing this site forward, making this a deliverable site. Countryside Properties will be undertaking further background work so that a detailed design can be prepared which complements the character of the surrounding built up area, whilst having regard to the Green Belt land to the east.

Appendix 2

Allocations Comments Table

Land at Bayleys Mead – Allocations Comments Table

Site Name	Site Ref	SHLAA Ref	Capacity	SHLAA Capacity	Phase 2 Comments
Brentwood Urban Area					
Highwood Close	001A	G160	38	20	Access improvement from Highwood Close required
Wates Way	003	N/A	128		Deliverability in terms of leases? Timescale.
ECC Fire HQ	005	B216	101	100	Intentions of Fire Service?
Adult Education Centre	006	B094	11	15	Developer interest? Capacity too high in terms of surrounding context?
Tendring Court	007	B096	10	10	Garage site, are they vacant, enough replacement parking?
Orchard Lane	011	B025	19	12	Capacity of site?
Lavender Ave	012	B142	10	10	In use as garages
Warley Training Centre	013B	N/A	38		Capacity?
Westbury Road	039	N/A	22		Council owned? Revised provision proposals.
Chatham Way	040	N/A	26		Council owned? Revised provision proposals.
Hunter House	041	N/A	22		Deliverability. Different landownerships? Commercial and residential.
King Georges Road	054	B186	10	6	In use as garaging?
The Drive	081	N/A	137		Council depot in use.
Baytree Centre	100	N/A	201		Redevelopment/build over?
Brookfield Close	131B	N/A	13		Garages/capacity.
Maple Close	133	N/A	14		Garages/capacity.
Brownfield Land in Villages					
Woodlands	009	B166	12	10	No developer interest recorded in SHLAA
Bell Mead	042	G101	16	16	Discounted site in SHLAA – mature trees and vegetation
Landings Surgery	043	B007	11	11	Discounted in SHLAA – active surgery
Brownfield Land in GB					
Sow and Grow	010	B213	48	42	Garden centre in use, Green Belt.
Ingatestone Garden Centre	128	N/A	130		Noise from A12? Is it brownfield? Capacity.
West Horndon Strategic Allocation					
WH Ind Estate, Childerditch Lane	020	B189	250	42	In employment use, replacement employment?
WH Ind Estate, Station Road	021	B188			As above

Thorndon Avenue WH	037A	G018	1000	300	Considerable infrastructure costs noted in SHLAA
	037B	G018			See above
Small Site Allowance					
Napier Arms	046	N/A	6		Closed for a while.
Magdalen Gardens	049	B101	8	4	No developer interest noted in SHLAA, contamination?
Hatch Road	053	B031	9	3	Garages 'appear' to underused in SHLAA
Fielding Way	093	N/A	10		Garages?
Hutton Dental	096	N/A	2		
Albany Road	132A and B	N/A	12		Garages
Gloucester Road	134	N/A	8		Scrub, capacity.
Hutton Drive	135	N/A	6		?
Church Crescent	136	N/A	4		Garages
Broomwood Gardens	137A	N/A	2		Garages.
Windfall Allowance					
20 per year			322		Why is there a windfall allowance given the assessment of small sites above?
Extant Planning Permissions					
			589		
				*	<i>Increase in capacity of 44 over SHLAA capacity excluding West Horndon</i>



Phase 2

PLANNING &
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