

Brentwood Borough Council
Brentwood Local Plan 2015-2030:
Preferred Options

Representations on behalf of
Wiggins Gee Homes Ltd

September 2013



Policy S2: Amount and Distribution of Residential Development 2015-2030

The Council's own "objective assessment" of housing need, carried out by Peter Brett Associates, estimated that around 350 new dwellings would be required each year, a total of 5,250 over the whole 15 year Plan period. The Plan makes provision for 3,500 new dwellings, some 2,250 short of this objectively assessed need. This shortfall in provision is justified by a lack of capacity, as identified in a number of studies, including the Housing Growth Scenarios Study carried out by Brentwood with its neighbouring Essex authorities.

If we assume that the "Objectively Assessed Needs for Brentwood" report is correct, a considerable amount of the need it identified should be catered for by the Preferred Options Document's proposals. This must result in one or more of the following consequences:

- the need not catered for by the Plan is diverted to, and met by, provision in neighbouring areas
- the identified needs may be diminished by as yet unforeseen changes in local social and demographic characteristics
- the need remains as predicted, increasing pressure on the Borough's housing stock, generating additional increases in prices and rents in the private sector, and a continuing lengthening of the waiting list for socially provided housing.

Paragraph 2.32 claims that any growth above the 3,500 level will:

"... cause irrevocable harm and it would become harder to deliver development in a sustainable manner".

Either the need identified by Peter Brett Associates is real and properly constituted or it is not. Assuming that it is, then the Preferred Options Document is choosing to export or defer to a later period a substantial part of this need. It will be left to the next Plan to decide how much irrevocable damage to other interests will be needed to accommodate what by then will be even greater pressures on housing provision.

The Plan's proposals apparently do not meet the area's objectively assessed housing needs. This is a very risky strategy, given the increasing evidence and concern about the crisis in housing provision, and simply delays tough decisions, that need making now, to a time when it will be even more difficult to provide the housing needed without the "irrevocable harm" that the Plan fears will happen.

Policy CP4: West Horndon Opportunity Area

The West Horndon Strategic Allocation is for mixed uses that allows for up to 1500 new dwellings during the Plan period. This allocation makes sense in trying to improve the range of community, commercial and employment opportunities within the existing village. The eventual outcome could be a more balanced and self-sustaining community. For these reasons this particular proposal should be supported.

Policy DM23: Housing Land Allocations – Major Sites

The West Horndon Strategic Allocation accounts for 43% of the total allocation of 3500. We have stated in our representation on Policy CP4 that this proposal should be supported.

There are five other allocations of one hundred plus dwellings as follows:

2	Wates Way Industrial Estate (Brentwood)	128
3	Essex County Fire Brigade (Brentwood)	101
13	Council Depot (Warley)	137
14	The Baytree Centre (Brentwood)	201
21	Ingatestone Garden Centre	130

Together these account for a further 20%.

Allocation 2 was discounted as a site in the 2011 SHLAA Final Report, as it was in use as a building supplies business. There has clearly been some change of intention here, but no evidence has been presented to confirm this.

Allocations 3 and 13 are both in public ownership. Their availability will presumably depend on service reorganisations and possibly the provision of alternative facilities elsewhere. Part of allocation 13 was discounted in the 2011 SHLAA for the following main reason:

“The site would not be suitable for development given its location adjacent to the BBC depot, its current uses and the need to access the site through the car park and depot. The development of the site would not provide acceptable residential amenity for future residents.”

The SHLAA concluded this was not an attractive site for residential development.

Allocation 14 is a good site for introducing new residential development in a town centre location. However, it looks like a difficult site to develop, and substantial clearing will be required before any construction can start. It was not included in the 2011 SHLAA assessment and so presumably has only recently come forward as a potential site.

Allocation 21 is located adjacent to the A12 Ingatestone Bypass. It is on much the same level as this road, and is a far from ideal location for residential development. Air quality and noise pollution, in spite of any preventative measures, will seriously degrade the area's residential amenities. This site should not have been considered suitable for new housing and would far better have been allocated for some form of commercial use. This, too, is an allocation not included in the 2011 SHLAA and must, like allocation 14, been put forward recently.

The balance of 37% is accounted for by the remaining sixteen sites. Two of these have capacity for around 50 dwellings, and the rest range in capacity from 10 to around 25. Of these smaller sites, four are existing garage courts, and two town centre car parks.

The two larger sites are allocation 8, the Warley Training Centre, and allocation 20, the

former Sow and Grow Nursery at Pilgrims Hatch. Part of allocation 8 was subject to the 2011 SHLAA and accepted as a potential housing site.

Four allocations are currently mainly used as garage courts, numbers 7, 12, 15 and 16. Numbers 7 and 12, both in Pilgrims Hatch, were included in the 2011 SHLAA. Their joint capacity was estimated at 18 units, which has been increased in the allocations to 29. Given the immediate surroundings of both sites, it is very unlikely that around 30 units can be achieved on these two sites. Allocation 12 as originally estimated would have fallen below the threshold for consideration as an allocation. In our opinion, both sites should be regarded as windfall sites if and when they come forward.

Allocation 15 is estimated at 13 dwellings. It looks very constrained by its surroundings and again we suggest that 13 dwellings is an over-estimate of what can be achieved here. Allocation 16 was considered and rejected by the 2011 SHLAA on grounds of availability and achievability. We need to see the evidence that led the Council to change its assessment of this site. In any case, this site should also be considered as a windfall site, and therefore not included as an allocation.

Allocations 9 and 10 are existing town centre car parks, neither of which were included in the 2011 SHLAA. The SHLAA did look at the station car park and concluded that it should remain as it was. Perhaps the Council has seen these two sites as a replacement for this proposal. They are good allocations in introducing further residential development into the town centre, but also latecomers to the process. How available are they, and will replacement car park capacity have to be found elsewhere before they can be used for housing?

The remaining eight sites, allocations 1, 4, 5, 6, 11, 17, 18 and 19, have a total estimated capacity of around 120 dwellings. Allocations 1, 4, 5, 6, 17, 18 and 19 were included in the 2011 SHLAA, and regarded as suitable. However, we contest the suitability of allocation 1, which is located close to the A12 trunk road. We believe nuisance arising from noise, fumes and disturbance will make this a poor and unhealthy environment for new housing (as with allocation 21). It is acknowledged that there is already housing adjacent to the site, but the new Plan should not repeat past mistakes that created a poor housing environment.

Allocations 9, 10, 11, 14, 15, 16 and 21 were all latecomers to the process. It appears they have not been subject to the same rigorous assessment as those that were considered in the 2011 SHLAA Final Report. Together they have an estimated capacity of around 400 to 450 dwellings, or around 12% of the total housing allocation capacity.

It also appears that capacity estimates on some of the smaller sites have been pushed upwards from the 2011 SHLAA estimates, presumably in an attempt to reach the 3,500 figure using a minimum number of sites.

We believe that the capacity of the allocations listed in Policy DM23 has been over-estimated. There are serious remaining questions about the availability and achievability of a number of these allocations.

Given that significant questions remain on the capacity, availability and achievability of some of the allocations included in Policy DM23, and the significant number of latecomers included that have not, it seems, been subject to the 2011 SHLAA process, further allocations are needed to realise the Policy's stated aim of providing the Council's low figure of 3,500 additional homes during the Plan period.

Land off Crow Green Lane, Pilgrims Hatch – SHLAA ref: G057

Representations have been made on behalf of the owners, Wiggins Gee Homes Ltd, since 2007 including a detailed analysis of their site off Crow Green Lane, Pilgrims Hatch and sketched layout schemes through the Call for Sites process.

The site is considered suitable for a mixed eco-home development, together with a community facility and a 'discovery play area' linked by a footpath network.

Brentwood Borough is covered by over 80% Green Belt. With few chances of development of brownfield Green Belt sites and redevelopment in parts of the main urban areas, sites such as the Wiggins Gee site fit neatly on to an existing built up area such as Pilgrims Hatch without contravening or compromising any of the 5 criteria set out in Green Belt policy, including urban sprawl as may well be the case elsewhere. The nearest settlement to Pilgrims Hatch is Kelvedon Hatch. Because of the distance involved, developing the site would not close the gap between the two settlements nor would it represent a significant intrusion into the countryside. There are much more significant constraints on and within Brentwood relating to site allocations, as outlined above.

We have pointed out in the past that all services are within easy walking distance of the site. It is therefore highly sustainable. Further, that the provision of mixed development of eco-housing will include family size affordable and market housing, together with dwellings for the growing elderly population. Pilgrims Hatch has been identified as having a deficiency in the provision of play areas/recreational open space.

Although priority is given to the redevelopment of brownfield sites to meet housing needs, it is inevitable that some rationalisation of the Green Belt boundary is now necessary to ensure the housing targets are met; even the lower figure of 3500 discussed above.

Summary

Consequently we are continuing to promote our clients' land at Crow Green Lane, Pilgrims Hatch, recorded in the 2011 SHLAA Final Report under reference G057, as a housing allocation with a capacity for around 60 to 70 dwellings. The site:

- is a sustainable location in terms of access to local community and commercial facilities
- is well served by existing public transport services

- is situated immediately adjacent to an established residential area
- has defensible boundaries
- has existing access and can be serviced by the utilities
- is in one ownership
- is readily available, achievable and suitable; there is no guarantee that all the preferred allocation sites will become available during the Plan period.

The site will provide a far better residential environment than that of some of the proposed allocations, in particular allocations 1 and 21.

On behalf of Wiggins Gee Homes Ltd, we reserve the right to make further representations at the next stage of the Local Plan process and participate in the inevitable Local Plan Inquiry, and we would be grateful to be retained on the Council's database.

David Russell Associates
September 2013