



**Our Ref: DS/ag/JCG01000**  
**Your Ref:**

**E-mail:**   
**Date: 17 February 2015**

Planning Policy Team  
Brentwood Borough Council  
Town Hall  
Brentwood  
Essex  
CM15 8AY

Dear Sir,

**BRENTWOOD BOROUGH LOCAL PLAN – STRATEGIC GROWTH OPTIONS CONSULTATION REPRESENTATIONS BY MR M SIDWELL, MR J BOWLER AND MRS J ALDERTON LAND AT HOOK END FARM, HOOK END**

I am instructed by Mr M Sidwell, Mr J Bowler and Mrs J Alderton to submit representations upon the Strategic Growth Options Consultation version of the Brentwood Borough Local Plan. The representations relate to Land at Hook End Farm, Hook End.

The representations include the following documents:-

1. Planning statement, prepared by RPS
2. Site location plan dated February 2015
3. Consultation questionnaire.

You should note that the representations seek to remove Land at Hook End Farm, Hook End, from the Metropolitan Green Belt and propose that the site be allocated for housing. The reasons for the representation is set out in the enclosed planning statement.

Yours faithfully,



**DANNY SIMMONDS**  
**Planning Director**

Enc.

**RPS**

**LAND AT HOOK END FARM,  
HOOK END**

**REPRESENTATIONS BY  
MR M SIDWELL, MR J BOWLER &  
MRS J ALDERTON**

**PLANNING STATEMENT  
(FEBRUARY 2015)**

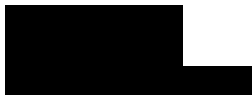
February 2015

**Our Ref: JCG01000**

**RPS**



**Tel:  
Fax:  
Email:**





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# 1 INTRODUCTION

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- 1.1 This planning statement has been produced in support of a representation made by Mr M Sidwell, Mr J Bowler and Mrs J Alderton to Brentwood Borough Council in February 2015. The representation is made in response to the Brentwood Borough Local Plan 2015-2030: Strategic Growth Options Consultation.
- 1.2 Mr M Sidwell, Mr J Bowler and Mrs J Alderton put forward Land at Hook End Farm, Hook End, as a potential housing site. The merits of Land at Hook End Farm (representation site) for housing are addressed in this planning statement.
- 1.3 The representation site is located centrally within the village of Hook End. Hook End falls within the administrative district of Brentwood Borough Council and is approximately 8km from Brentwood town centre. The representation site is approximately 9 hectares (22 acres) and is currently in agricultural use, used for grazing.
- 1.4 The site is largely surrounded by existing residential development. The site is bounded by Hook End Lane to the west and Hook End Road to the south. Residential development adjoins the representation site to the north and to the east. Also to the west is Hook End Farm, which falls outside of the representation site.
- 1.5 The site does fall within the Metropolitan Green Belt. However, for reasons set out in this statement, there are very good reasons for removing the site from the Green Belt and allocating the site for housing.

## 2 HOUSING BACKGROUND

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- 2.1 It is absolutely clear from the Borough Council's work to date on their emerging Local Plan that there is an issue in terms of finding enough land to meet housing requirements. Prior to issuing this Strategic Growth Options document, the Council produced a Preferred Options version of the draft Local Plan, in July 2013.
- 2.2 The Preferred Options version of the Local Plan was only able to identify sites to accommodate 3,500 new homes. This figure, and the apparent shortfall of housing, attracted objections from neighbouring authorities, namely Basildon Council, Chelmsford Council and Thurrock Council. The thrust of the objections being that the Preferred Options document did not propose to meet all of Brentwood's housing need, and that these adjoining authorities would not accept any shortfall from Brentwood Borough within their own boundaries.
- 2.3 Under such circumstances, it is known that Brentwood Borough Council recognise that there is a real prospect that the Local Plan would be likely to be found 'unsound' at a Local Plan Examination in Public. Indeed, the consequences of failure to meet full housing need has become clearly evident in decisions both from the Secretary of State and Planning Inspectors, in relation to specific housing proposals and also other Local Plan examinations. Notably, local plans that did not meet full housing needs have been found 'unsound' on the basis that they do not conform with the National Planning Policy Framework (NPPF). Accordingly, Brentwood Borough Council have taken the decision not to proceed to the pre-submission stage with the Preferred Options version of the Local Plan.
- 2.4 Rather, the Borough Council have now decided to proceed with this Strategic Growth Options Consultation document, to which this representation relates. The Strategic Growth Options document provides an overview of the main views to be considered as part of the Local Plan process.
- 2.5 The Strategic Growth Options document recognises a number of important points:-
- The NPPF sets out that local planning authorities should objectively assess their market and affordable housing needs and provide for that in full.
  - The capacity of all brownfield sites within urban areas in the Borough could provide for a maximum of 2,500 new homes. That means any housing provision above this would need to consider use of Green Belt land.
  - The Council has commissioned a study to identify objectively assessed housing needs for the Borough, which concludes a requirement to provide for around 360 new homes per year. Over 15 years that comes to around 5,500 homes, some 3,000 more than what can be provided from brownfield sites in urban areas.
  - It is also important to consider the need for a more affordable housing.
- 2.6 Accordingly, in order to meet its housing requirements, Brentwood Borough Council must release Green Belt land for housing. This representation and the request to remove Land at

Hook End Farm from the Green Belt, to be replaced by a housing allocation, is submitted within this context.

- 2.7 Indeed, the Strategic Growth Options document does contemplate the possibility of releasing sites to the north of the Borough, which is made up of a collection of villages, including Hook End. For example, paragraph 2.15 of the document states that it is important to consider allowing villages to grow in order to provide for local need. The same paragraph recognises that sites on the edge of villages could be released. Those points add further support to the release of a site such as the representation site.

### 3 MERITS OF LAND AT HOOK END FARM

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3.1 The representation site benefits from a number of characteristics which make it particularly suitable as a site for housing. These characteristics are set out below:-

**a) Relationship to Built-Up Area**

3.2 Unlike many other potential Green Belt/housing sites, Land at Hook End Farm is sandwiched between existing residential development. To the north is residential development on the roads of Hook End Lane/Nursery Road/First Avenue. To the east is the residential development on the roads of Hook End Road/Spring Pond Meadow. To the west is Hook End Farm.

3.3 As apparent from the site location plan (submitted with this representation), the representation site forms a logical infill between the existing parcels of development that form the village of Hook End. Consequently, the effects of residential development on the representation site will be to consolidate development in Hook End, so as to form a logical and clearly defined settlement.

3.4 To the south and west are Hook End Road and Hook End Lane respectively, which are the two principal roads within the village for Hook End. Bus stops are located close to the representation site providing regular services to Brentwood and the surrounding area.

**b) Lack of Constraints**

3.5 Unlike many Green Belt and greenfield sites, the representation site is unconstrained in planning terms. Apart from its position in the Metropolitan Green Belt, the representation site does not contain any prohibitive planning designations. Notably, the representation site is not within a conservation area, a special landscape area, a landscape improvement area, a County wildlife site, a site of special scientific interest or a local nature reserve. These designations apply to a number of sites within Brentwood Borough, outside the built-up area. Furthermore, the representation site is not within a flood zone and does not comprise either Grade I or Grade II agricultural land. On the issue of agricultural land, the representation site has been used for many years for the grazing of horses and therefore is of little value in terms of agricultural quality.

**c) Size of Representation Site**

3.6 At 9 hectares (22 acres), the representation site is reasonably large. At this size, the site is indeed large enough to accommodate well in excess of 100 houses, which can make a meaningful contribution to the Borough's housing requirement. Furthermore, the site is large enough to accommodate other development that may be beneficial to residents of the village. For example, if necessary, it would be possible to accommodate some local shops, areas of open space and other community facilities, albeit such matters would need to be discussed with local residents, the Parish Council and other local groups. Additionally, the site could accommodate a range of house types, including affordable housing.

Accordingly, the release of Green Belt land in this case can bring forward significant benefits, unlike the release of much smaller sites.

d) **Availability and Deliverability**

- 3.7 The representation site is in the ownership of the three parties making this representation, with additional interests held by other family members. All parties fully support this representation and are content to promote the site for residential development. Furthermore, there are no physical or practical constraints in bringing forward development on this site. Accordingly, the site is available and deliverable and is able to make a significant contribution to meeting the Borough Council's housing requirements, in the short term, if necessary.



## 4 GREEN BELT CONSIDERATIONS

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- 4.1 The Government's policy on Green Belt is contained in the National Planning Policy Framework (NPPF). Paragraph 83 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, but that any alteration of boundaries should be undertaken through the preparation or review of the local plan. In this case, the need to meet housing requirements is such an exceptional circumstance, which will be addressed through this review of the Brentwood Local Plan.
- 4.2 Importantly, paragraph 80 of the NPPF states that the Green Belt serves five purposes, which are as follows:-
- To check the unrestricted sprawl of large built-up areas
  - To prevent neighbouring towns merging into one another
  - To assist in safeguarding the countryside from encroachment
  - To preserve the setting and special character of historic towns
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.3 The representation site is considered against each of these purposes:-
- i) The representation site is an infill site, bringing together two residential areas which form the village of Hook End. Development will not extend the limit of the existing built up area. Consequently, development on the representation site will not have the affect of creating ~~sprawl~~ In any event, the settlements of Hook End and neighbouring villages do not constitute ~~large built-up areas.~~
  - ii) For the reasons set out in (i) above, development on the representation will not have any effect in terms of encouraging the merging of neighbouring towns. Rather, the effect is to join two separate parts of the village.
  - iii) By the nature of the representation site in relation to the existing built-up area, development will not constitute ~~encroachment~~in to the countryside.
  - iv) There are no historic towns nearby and therefore this purpose has no relevance
  - v) It is clear from work undertaken by the Borough Council that there is not sufficient derelict and other urban land available to meet housing requirements. Consequently, Green Belt land needs to be released for housing and therefore protecting Green Belt sites will not have the desired effect of encouraging the recycling of derelict and other urban land.
- 4.4 Accordingly, it is clear that the representation site does not fulfil any of the five Green Belt purposes. For this reason alone, the representation site has merit and should be considered favourably as a potential housing site.

- 4.5 In addition to the five purposes of Green Belt, paragraph 85 of the NPPF, amongst other points, advises that local planning authorities should define the boundaries of the Green Belt, using physical features that are readily recognisable and likely to be permanent. On the basis of the site's relationship to the built-up area, development will enable a more logical Green Belt boundary to be drawn, which more probably recognises the features of the village.

## 5 SUMMARY AND CONCLUSIONS

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- 5.1 The representation site is Land at Hook End Farm, Hook End. The representation site is located centrally within the village of Hook End, being largely surrounded by existing residential development. The site falls within the Metropolitan Green Belt.
- 5.2 Brentwood Borough Council have a shortfall of housing in relation to objectively assessed needs. In order to meet this shortfall, the emerging Local Plan recognises that Green Belt land needs to be used. One of the options considered is utilising sites on the edge of villages.
- 5.3 The representation site benefits from a number of characteristics which make it particularly suitable as a site for housing. It is well related to the built up area, it is unconstrained in planning terms, it is available and deliverable, plus it is large enough to make a meaningful contribution to meeting housing need and in addition provide other facilities to the benefit of the community.
- 5.4 The representation site does not fulfil any of the five Green Belt purposes, as set out in the NPPF. Rather, on the basis of the site's relationship to the built up area, development will enable a more logical Green Belt boundary to be drawn.
- 5.5 In conclusion, the site is of little value in Green Belt terms and can more effectively be used for housing, assisting the Borough Council in meeting housing requirements.

Internal use only
Comment No.
Ack. date



**BRENTWOOD  
BOROUGH COUNCIL**

**Brentwood Borough Local Plan**

# Strategic Growth Options Consultation

January 2015

## Consultation questionnaire

This consultation questionnaire relates to the Brentwood Local Plan Strategic Growth Options Consultation and is provided for you to make comments. Please take the opportunity to read the consultation document before filling in this form and returning to:

**Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY**  
or by email to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

Comments need to be received by 5pm on Tuesday 17 February 2015

If you need any help completing this form please contact the Planning Policy Team using the contact details given above or by telephoning 01277 312620.

## Personal Details

Title: <b>MR</b>	First Name: <b>DANNY</b>	Last Name: <b>SIMMONDS</b>
Organisation (if applicable): <b>RPS GROUP (ON BEHALF OF MR M SIDWELL, MR J BOWLER AND MRS J ALDERTON)</b>		
Job title (if applicable):		
Address: [REDACTED]		
Post Code: [REDACTED]	Telephone Number: [REDACTED]	
Email Address: [REDACTED]		

## Questions

The Council is seeking responses on key issues. Focused questions appear in bold boxes throughout the Strategic Growth Options document. These questions are summarised in this consultation questionnaire. More information can be found at [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan).

Please use an additional sheet if necessary. Please note that all responses will be published online.

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Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?

Yes  No

**Comments**

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Q2: Do you agree with the issues raised within each of these areas?

Yes  No

**Comments**

?

Q3: Do you have any comments on the appropriateness of particular sites? Yes  No

**Comments**

SEE COVERING LETTER DATED 17 FEBRUARY 2015

?

Q4: Given the greater capacity for growth along the A127 corridor, which of the sites put forward do you think is the best location for growth?

**Comments**

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Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?

Yes  No

Comments

?

Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?

Comments

SEE COVERING LETTER DATED 17 FEBRUARY 2015

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Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?

Yes  No

Comments

?

Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a "Town Centre First" approach should be taken to retail development?

Yes  No

Comments



Q9: Are there opportunities for more open space provision in the area where you live?

Yes  No

**Comments**



Q10: Please rate the level to which you value the landscape near where you live (on a scale of 1 to 5), as compared to other areas within Brentwood Borough, for the following aspects:

Aspect:	Very Low	Low	Average	High	Very High
Scenic Beauty / Attractiveness	1	2	3	4	5
Outdoor Recreation / Leisure Use	1	2	3	4	5
Wildlife Interest	1	2	3	4	5
Historic Interest	1	2	3	4	5
Tranquility	1	2	3	4	5
Other – please specify: .....	1	2	3	4	5



Q11: To what extent do you think the following are present in the landscape near where you live (on a scale of 1 to 4):

Aspect:	Absent	Occasional	Frequent	Predominant
Houses	1	2	3	4
Commercial / Industrial buildings	1	2	3	4
Nature Reserves / Wildlife	1	2	3	4
Farmland	1	2	3	4
Woodland	1	2	3	4
Degraded / Derelict / Waste land	1	2	3	4
Infrastructure (Road / Rail / Pylons etc.)	1	2	3	4
Leisure / Recreation Facilities	1	2	3	4
Other – please specify: .....	1	2	3	4



Q12: Have we considered the main infrastructure issues? Are there other important issues to consider? Yes  No

**Comments**



Q13: What do you think the priorities for infrastructure spending should be?

**Comments**

**Thank you for taking the time to complete this questionnaire**

Please ensure that you return comments to the Council by 5pm on Tuesday 17 February 2015  
(see page 1 for details)