

[REDACTED]

---

**From:** David Russell [REDACTED]  
**Sent:** 16 February 2015 14:24  
**To:** Planning Policy  
**Subject:** Strategic Growth Options Consultation  
**Attachments:** 1707Strategic Growth Options consultation 2015.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Brentwood Borough Local Plan 2015-2030 – Strategic Growth Options Consultation January 2015**  
**Wiggins Gee Homes Ltd**  
**Site 159: Land off Crow Green Lane, Pilgrims Hatch**

Further to my telephone conversation today with Mr Drane, please find attached a representation to the above document on behalf of Wiggins Gee Homes Ltd. This representation should be read in conjunction with all representations and correspondence to the previous Plan relating to Site 159.

Please do not hesitate to contact me should you require any further information at this stage, or if you require this submission in a different file format.

We would be grateful for confirmation of receipt of this email and attachment.

David Russell

David Russell  
David Russell Associates

t: [REDACTED]  
m: [REDACTED]  
e: [REDACTED]

-----  
This email is intended solely for the addressee. It may contain confidential or privileged information. If you have received it in error, please notify us immediately by telephone and delete the message. If you are not the intended recipient you must not copy, distribute, disclose, take any action or rely on it or any attachment in any way.

Click [here](#) to report this email as spam.

Brentwood Borough Council

Brentwood Borough Local Plan 2015-2030  
Strategic Growth Options Consultation January 2015

Representations on behalf of  
Wiggins Gee Homes Ltd

Site 159  
Land off Crow Green Lane, Pilgrims Hatch

February 2015

## 1 Introduction

- 1.1 Since 2009, we have promoted 2.8 hectares (6 acres) of land off Crow Green Lane, Pilgrims Hatch, as a development allocation for inclusion in the local development plan, now known as the Brentwood Borough Local Plan. The land is referred to in the Consultation Document as Site 159. We have also put the site forward through the Council's SHLAA process, under reference G057.
- 1.2 Our main interest in the Consultation Document is its provisions for housing growth and associated community facilities. We have structured these initial representations around the Consultation Document's thirteen questions as set out in Section 7: Summary. However, we would like to comment first on the assessment of housing need on which the Document's Growth options are based.
- 1.3 In our representations on the Council's July 2013 Local Plan Preferred Options for Consultation, we stated our objection to the Council's intention not to cater for all of the Borough's "objectively assessed" housing need. We described this as a very risky strategy that would only delay decisions that had to be made on achieving an effective balance between meeting housing need and conserving the environment. We are pleased to note in the current consultation that the Council now intends to meet all the objectively identified needs.
- 1.4 We have always been aware that Brentwood Borough has a high percentage of Green Belt land, significantly constraining development opportunities. Adjustments therefore need to be made to the current Green Belt boundary, which can be achieved without materially compromising its purpose. This will then accommodate the 3000 new homes that cannot be catered for on brownfield land.

## 2 2: Managing Growth

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

2.1 We supported Option 2 as set out in the 2013 Preferred Options Document, which concentrated growth within the Borough's two main transport corridors. We think this is the best overall growth strategy for the Borough. In naming these corridors, we suggest moving away from using road names, using instead either "transport corridor" or the name of the railway line running through each. This would help shift the emphasis away from road to more sustainable transport modes. We also believe the Borough should be divided into four areas for the purposes of managing growth, as follows:

- The Rural North
- The Brentwood/Shenfield Transport Corridor
- The Rural South
- The West Horndon Transport Corridor.

2.2 The Document's Figure 6b shows approximate boundaries for the A12 Corridor. We support the boundary shown between Area (A) North of the Borough and Area (B) the A12 Corridor. This will allow for some modest growth around the edges of Pilgrims Hatch, which is where Site 159 is located. We suggest that the southern boundary is drawn closer to the urban edge of Brentwood and Shenfield, allowing the creation of a new southern rural area between the A12 Corridor and the A127 Corridor.

### 3 3: Sustainable Communities

Q3: *Do you have any comments on the appropriateness of particular sites?*

- 3.1 We have promoted Site 159 as representing a relatively modest urban extension that can provide a mix of housing and community facilities in the Pilgrims Hatch area. We note from the Consultation Document's paragraph 6.5 that the Council is looking to collaborative projects to ensure that appropriate healthcare facilities are provided to serve growth areas. Paragraph 6.8 also says the Council wishes to ensure that *"new community facilities are delivered alongside new homes to support sustainable communities"*. In promoting Site 159 we have consistently stated our clients' willingness to make part of the site available for community use. We have prepared sketch schemes showing that housing and community facilities can easily be accommodated on Site 159. In discussions with Highways Officers, they stated they had no objections with regard to access, which is easily achievable to and from the site. Given the continuing ageing of the Borough's population, we further suggest, amongst other things, a care home in a semi-rural setting that will cater for the needs of older people.
- 3.2 Site 159 is within the Green Belt, immediately next to the existing urban edge. It has wholly defensible boundaries, and is currently used as grassland. There is a mixture of paddocks and buildings to the west. Housing all the way along the site's southern boundary presents a raw urban edge to this part of Pilgrims Hatch.
- 3.3 The Green Belt's main functions are:
- to check the 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.
- 3.4 The Council has already considered all possible urban land recycling within the Borough and concluded that there is still a requirement to find land in the Green Belt for some 3,000 homes. Our assessment of Site 159 against the other four Green Belt functions is:
- sprawl – the site has buildings on two sides and definitive boundaries on the others; contribution to preventing urban sprawl relatively small
  - merging of towns – large rural area to the north; contribution to preventing merging of towns negligible
  - countryside – buildings on two sides, with strong defensible boundaries to north and east; contribution to safeguarding countryside relatively small
  - setting of town – the site is a narrow strip of land on the urban edge of Pilgrims Hatch. It makes a negligible difference to the setting of Brentwood as

an historic market town.

Compared to many of the potential development sites shown within the A12 Corridor, allocating Site 159 would have relatively minor consequences for the function of the Green Belt in this part of the Borough. The site provides an ideal opportunity to make an early contribution to the Borough's identified housing needs and improve local community facilities. We have noted in past consultations the Council's identification of changes in local demographics, the most significant being a predicted continuing growth in the numbers of older people. Sites like 159 will provide opportunities for new facilities meeting the needs of older people on a relatively modest development close to the countryside. This would be a direct response to the Consultation Document's call, in paragraph 6.8, for new community facilities delivered alongside new housing.

*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?*

- 3.5 We have consistently supported the A127 Corridor as an ideal location for a strategic development land allocation. This situation is now complicated by the proposed Dunton Garden Village, mainly located in Basildon District, but partly in the Borough. We think this is an ill-conceived idea that will seriously undermine the purposes of the Green Belt, especially in preventing the merging of neighbouring towns along the A127 Corridor.
- 3.6 We believe any new strategic development in this area should take the form of a high density, walkable settlement with West Horndon Station being developed as its main transport and commercial hub. The best site for achieving this would be the 2013 Consultation Document's West Horndon Strategic Allocation. To make the best use of West Horndon Station as a hub, it would be sensible to extend the strategic allocation across the Borough boundary into Basildon District.

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

- 3.7 Yes. We believe the search should start around the northern edges of Brentwood and Shenfield, since it is here that the release of small to moderate sized sites will have the least impact on the primary functions of the Green Belt.
- 3.8 The countryside between Brentwood and Shenfield, and West Horndon and Basildon to the south and south-east, is relatively narrow. Given the proposed westward expansion of Basildon and strategic growth allocation at West Horndon, it would be sensible to minimise allocations along the southern edges of Brentwood and Shenfield. Some of the sites shown on the Consultation Document's Figure 10, south and south-east of Shenfield and Hutton, would represent major intrusions into the Green Belt. Allocating Sites 028C and 192 would be particularly damaging to Green Belt functions in this area.

- 3.9 Any strategic allocation made at West Horndon will have a long lead in time before it will start to contribute to the Borough's housing needs. This is not the case with Site 159. New allocations in the A12 Corridor should include a mixture of small to medium sized sites, coming on stream earlier in the plan period, to maintain the five year housing land supply required by the National Planning Policy Framework.

## 4 6: Quality of Life & Community Infrastructure

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

4.1 We note the Consultation Document's reference in paragraph 6.4 to a growth in demand for school places and that at primary level existing capacity will be exceeded around 2017/2018. We also note what is said in paragraph 6.5 about healthcare provision. We have stated above our clients' willingness to dedicate part of Site 159 to a new healthcare facility or residential care home to serve Pilgrims Hatch. This is a direct and positive response to the Council's aim, set out in the Consultation Document's paragraph 6.5:

*“Plans to mitigate this (population) growth via developer funded and other collaborative working projects will be agreed before planning permissions are granted.”*

4.2 There is a general mention of investment in transport infrastructure. If the Council were to adopt the approach suggested above, developing a strategic allocation around West Horndon, investment in a new station hub and linked pedestrian/cycle networks would be critical to its success.

4.3 We see the overall priorities for infrastructure as follows:

- new community facilities as determined through consultation with local communities including the community of Pilgrims Hatch
- healthcare facilities, in particular those aimed at meeting the needs of the Borough's ageing population
- a new railway station hub, and footpath and cycleway networks, for the proposed West Horndon strategic growth area.




## 5 Conclusions

- 5.1 Sites that are readily available and make negligible contribution to the aims of the Green Belt, such as Site 159 at Pilgrims Hatch, should be considered for development early in the plan period. Such sites with relatively short development lead in times will relieve pressure on the Council's five year housing land supply, as required in the current National Planning Policy Framework.
- 5.2 If Site 159 is removed from the Green Belt, it will be wholly suitable, achievable and, as stated previously, readily available to satisfy both housing and community infrastructure needs of the area. No other site in and around Pilgrims Hatch can take all these matters on board.
- 5.3 This initial representation must be read in conjunction with all representations and correspondence to the previous Plan relating to Site 159 at Pilgrims Hatch. We will wish to make further representations at the next stage of the Brentwood Borough Local Plan 2015-2030.

*David Russell Associates  
February 2015*



Project Title:		National Grid Reference:		Notes	
LAND AT CROW GREEN LANE, PILGRIMS HATCH BRENTWOOD		N/A			
Client:		Plan Coordinate Control:		National Grid Reference:	
DAVID RUSSELL ASSOCIATES		N/A		N/A	
Description:		Level Datum:		Scale	
ORDNANCE SURVEY PLAN		N/A		1:1250	
		Date		Rev.	
		15.05.09		Date	
		Job No.		Rev.	
		GY13122		Date	
		Drg No.		Rev.	
		10001		Date	
				Revisions	


**ISHINE SURVEY LTD**  
 SURVEYORS & ENGINEERS  
 BRENTWOOD