




30 September 2013

Dear Sir,

Brentwood Borough Council: Local Plan 2015-2030

1. I am responding to Brentwood Borough Council's public consultation exercise into the draft policies and proposals contained in the Local Plan 2015-2030: Preferred Options for Consultation. In particular I am objecting to Core Policy S2 for the reasons given below.
2. I am the joint freehold owner, together with other members of my family, of an area of some 9.7 Ha of land in Chelmsford Road, Shenfield. The land is bounded by Chelmsford Road, the Mountnessing Roundabout and slip road off the westbound A12 at junction 12, the main Norwich to London railway line and, to the south west, by the site identified in the Council's document "Strategic Housing Land Availability Assessment, Final Report, October 2011" (SHLAA) as G091: Officer's Meadow (see Sheet 4: Borough Central East). Our site is registered under Title Numbers EX935624 and EX159658 and is referred to hereafter as "the Site".
3. I am making these representations on behalf of the joint owners.
4. Core Policy S2 of the draft Local Plan is concerned with the amount and distribution of residential development over the plan period (2015-2030). It proposes an average target building rate of 233 dwellings per annum. This represents a total of 3,500 dwellings over the plan period. This figure is less than the objective assessment of need conducted for the Council which concluded that "a figure of somewhere between 331 and 362 homes a year" were required (paragraph 2.30 of the Preferred Options consultation report). This represents a total of between 4,965 and 5,430 dwellings by 2030, ie between 42% and 55% more than is provided for in the draft Local Plan. Furthermore it is proposed by the Council that 1,500 of the new dwellings (43%) should be located in West Horndon.

5. Paragraph 47 of the National Planning Policy Framework (NPPF) states that to boost the supply of housing significantly, local planning 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, 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;...”

The paragraph goes on to say that local planning authorities should identify and update a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of (at least) 5%. They should also identify a supply of specific developable sites or broad locations for growth for years 6-10 and, where possible, years 11-15.

6. The current Preferred Options Core Policy S2 does not meet the full objectively assessed housing needs of the Borough and is too reliant on the strategic allocation of sites in West Horndon.

7. The Site can make a positive contribution to this shortfall in housing provision over the plan period for the following reasons:

(i) Its development would be sustainable (as defined in paragraph 7 of the NPPF).

(ii) The site is both deliverable and developable – see the footnotes to paragraph 47 of the NPPF: it is available now, suitably located, has a realistic prospect of early development and is economically viable. The site could accommodate at least 250 dwellings.

(iii) It is located at one of the three Key Gateways to the Borough.

(iv) It is adjacent to another development site which is designated as an area of employment growth (Policy DM7: Land at Mountnessing Roundabout).

(v) Development of the site would be in conformity with the draft Local Plan's Strategic Objectives SO1: direct development growth to the existing urban area of Shenfield in a location that is well served by local services and facilities; SO2: development growth that can be accommodated by existing or proposed infrastructure services and facilities; and SO8: housing that meets the needs of the Borough's population and which contributes to creating inclusive, balanced and sustainable communities.

(vi) It enjoys the same locational advantages attributed to Officer's Meadow, the adjoining site identified as reference G091 in the SHLAA that was shown in that document as a potential Greenfield site:

“The site is suitable for development as it is located in a sustainable location, close to the Shenfield shopping area and rail station. It is enclosed by the Chelmsford Road and railway line and therefore limiting

any further encroachment into the countryside. The site is also located on a public transport route which provides direct access to the town centre.”

The Site is further bounded by the A12 roundabout and slip road and is thus more enclosed than site G091.

8. The Site is within the Green Belt but is not within a Special Landscape area. The draft Local Plan does not envisage any changes to the Green Belt boundaries. Paragraph 83 of the NPPF says that once established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. The preparation of the Local Plan 2015-2030 offers such an opportunity.

9. The NPPF continues by setting out guidelines that local planning authorities should follow when defining Green Belt boundaries. These include the exclusion of land from the Green Belt which it is not necessary to keep permanently open; to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent; and to satisfy themselves that the boundaries will not need to be altered at the end of the development plan period. It is submitted that by these criteria the Site does not make a significant contribution to the function of the Green Belt and should be released for residential development.

10. The Site is surrounded on three sides by an elevated mainline railway, a slip road from the A12/Mountnessing Roundabout and the Chelmsford Road. The adjacent designated employment site DM7 is also in the Green Belt. The Council have already recognised that the frontage onto Chelmsford Road along the Site’s boundary is a ribbon development within the Green Belt that is suitable for residential infill development and changes of use to residential (Policy DM12). Paragraph 4.42 of the consultation document states:

“However, there are a very few limited, well defined areas within the Green Belt where tight knit frontage ribbon development already exists which is sufficiently urban in character to allow some relaxation of Green Belt Policy.”

Nos. 169-293 Chelmsford Road (fronting the Site) form one of the designated frontages.

9. The Site satisfies the criteria that are listed in paragraph 4.93 of the draft Local Plan and which were used by the Council to allocate specific sites for development.

10. The Council’s preferred Spatial Strategy states that all development sites will be identified having regard to whether they:

(a) are accessible to public transport, services and facilities – the Site satisfies this criterion.

(b) will have no significant impact on the Green Belt etc – the Site is in the Green Belt but for the reasons given it is not considered that the Site contributes significantly to the functions of the Green Belt given its location.

(c) are likely to come forward over the plan period – the Site satisfies this criteria.

11. In conclusion the Site is capable of contributing to a shortfall in the Local Plan's proposed housing provision under Core Policy S2 compared with the objective assessment of housing need. The development of the Site accords with the other Local Plan policies and its release from the Green Belt would be justified by its location and the physical characteristics of its boundaries. The Site is deliverable, developable and available and would contribute significantly to meeting the Borough's objectively assessed housing need. Alternatively the Site should be identified as safeguarded land for future development.

Yours Faithfully,

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