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Planning Policy Team,
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17th February 2015

Dear Sir / Madam,

Re: Brentwood Borough Local Plan - Strategic Growth Options Consultation/Dunton Garden Suburb Consultation – Land at Stocks Lane, Kelvedon Hatch

I write in relation to the Brentwood Borough Council Strategic Growth Options Consultation. Strutt and Parker LLP are acting on behalf of W.H. Norris & Sons, who own the land outlined in red on the enclosed plan.

The purpose of this letter is to outline the suitability of the land at Stocks Lane, Kelvedon Hatch to support an apportionment of the Council's objectively assessed housing need within the emerging Local Plan. In addition, direct responses are provided with regards to the Brentwood Borough Council Strategic Growth Options Consultation framework. Comments are also made in response to the proposed Dunton Garden Suburb consultation.

The representation confirms that the land at Stocks Lane, Kelvedon Hatch presents a greenfield land opportunity which would support the Council's need to provide a sustainable level of housing and meet the objectively assessed housing needs.

The questions addressed in detail are:

- *Do you agree with the broad areas, for the purpose of considering approaches to growth?*
- *Do you have any comments on the appropriateness of particular sites?*
- *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)?*



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

The broad areas identified in the plan are generally supported. The focus of these areas around transport corridors reflects the need to focus growth and strategic scale development around these linkages. It should however be emphasised that there are smaller scale opportunities in other areas of the Borough for development that could provide modest extensions to well-serviced settlements and support the Borough's need for housing in rural areas.

Adequate sites in villages outside of the key growth areas should be considered as suitable sites for residential development in order to comply with the National Planning Policy Framework's (NPPF) desire to promote sustainable development in rural areas by locating housing "where it will enhance or maintain the vitality of rural communities" as stated in Paragraph 55.

The option of small scale village growth in the north of the Borough, identified as Growth Option A within the Strategic Growth Options Consultation documents, is supported. Although the transport network may restrict large scale growth in these villages, the small scale release of green belt at village development boundaries would provide the growth required to maintain prosperous rural economies and enhance the vitality of rural communities, in line with the NPPF.

Dunton Garden Suburb

The proposed allocation of between four and six thousand units at Dunton Garden Suburb provides recognition of the housing demand in the Borough. However, an adequate spread of housing needs to be provided across the Borough in order to meet the housing needs of different areas. The housing need of Hutton/Shenfield/Brentwood area will not be met from the delivery of Dunton Garden Suburb.

In addition the scale and strategic nature of the allocation of the development will present the council with significant challenges in the delivery of housing in the short term. As set out in paragraph 47 of the NPPF to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land.

The infrastructure requirement for large strategic sites such as Dunton will be considerable and a development of this size is not likely to come forward until later in the plan period. In addition, to comply with paragraph 47 of the NPPF it is imperative that the Council provide choice and competition for market land, which can only be achieved through the allocation of a range of different sites, not just Dunton Garden Suburb.

The allocation of land at Kelvedon Hatch will not only help support the rural community, but it will be of a scale that can be delivered in the short term to meet the housing requirements for the early years of the plan period (prior to Dunton Garden Suburb being delivered). It will also assist in providing the choice and competition for market land as set out within the NPPF.



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

Strutt and Parker LLP are acting on behalf of W.H. Norris & Sons in order to promote land at Stocks Lane, Kelvedon Hatch. The land is in single ownership of W.H. Norris & Sons and has been previously submitted, in part, (SHLAA ref: G028) to the Council for consideration due to its potential to provide residential development. The Council has therefore previously considered the potential for this site and recognises that it is both suitable and achievable. An indicative layout has been developed (see attached scheme) and it is anticipated that the site could provide 20-25 dwellings as a modest extension to the village, as well as a significant area of public open space. The design is flexible however and the site layout could be developed to meet a range of local housing and community needs.

The village offers a Post Office, a local convenience store, pubs and restaurants, a primary school and other community facilities and services. The village is also in close proximity to Brentwood which provides a further extensive range of educational, retail and leisure facilities for village residents. Brentwood is a 20 minute bus journey from a bus stop situated close to the site, at the junction of Stocks Lane and Blackmore Road. Buses run regularly to Brentwood.

The site is adjacent to the existing settlement boundary to the north and it is also opposite the settlement boundary to the east. The site presents a logical extension to the well-serviced village of Kelvedon Hatch. The site's position in relation to the existing settlement boundary ensures that development here would have a minimal impact on the Green Belt and would be in-keeping with the current settlement layout. There is existing development to the east of Stocks Lane and so a small village extension to the west would reflect this pattern and extend no further into the Green Belt.

An Access Appraisal has been conducted for the site by Journey Transport Planning, and is enclosed with this letter. It concludes that the site can take appropriate access from a new priority junction arrangement designed in accordance with current standards of geometry and visibility directly off Stocks Lane. The appraisal also concluded that the additional trips associated with the proposal can be accommodated safely on the local road network.

With an access available, and as a greenfield site, the land presents no significant constraints that may affect the delivery of the site and it is therefore recommended that it is carefully considered during the development of the new Local Plan.

The allocation of this site is therefore considered to be sound and in keeping with the tests of a Local Plan as set out within the NPPF.

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)?

Scenario C in the Strategic Growth Areas Consultation report sets out a Housing Growth that meets objectively assessed needs and accounts for past unmet need. This is based on 6,200 dwellings over the 15 year plan period.



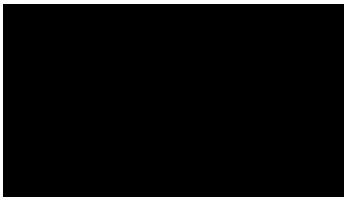
The objectively assessed housing needs for Brentwood Borough Council far exceed the availability of brownfield land in the borough. The council cannot provide a sustainable level of housing in the borough without allocating suitable Green Belt land opportunities.

It is considered preferable to release Greenfield sites on the edge of villages where suitable. Such release of green belt sites should be considered when land is adjacent to existing settlement boundaries and will therefore have a minimal impact on the openness of the countryside. Sites should be considered where they are sustainably located and well-situated with regards to existing community facilities and services.

Overall this representation has demonstrated that land at Stocks Lane, Kelvedon Hatch represents a logical expansion to the village in order to meet rural housing need and is fully deliverable in planning terms. The allocation of this site would provide a plan that is both justified and effective in meeting the criteria as set out within the NPPF.

If you have any questions regarding this representation please do not hesitate to contact me on my client's behalf.

Yours sincerely,



David Fletcher
Associate Planner
Strutt & Parker