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17<sup>th</sup> February 2015

Dear Sir / Madam,

**Re: Brentwood Borough Local Plan - Strategic Growth Options Consultation/Dunton Garden Suburb Consultation – Land east of Hall Lane, Shenfield**

I write in relation to the Brentwood Borough Council Strategic Growth Options Consultation. Strutt and Parker LLP are acting on behalf of Mr C.H. Courage, who owns the land outlined in red on the enclosed plan. The land outlined in blue on the accompanying plan is under the ownership of a third party. Mr Courage is currently entering discussions with this adjacent landowner however, to ascertain the potential for a joined-up approach to ensure suitable access to Mr Courage's land, and offer a more strategic scale approach for growth at Shenfield.

The purpose of this letter is to outline the suitability of the land east of Hall Lane, Shenfield 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 Shenfield 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?*
- *Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?*
- *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 be emphasised that there are opportunities in urban areas of the Borough for development that could provide modest extensions to well-serviced settlements and support the Borough's need for housing.

Adequate sites in 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 well-connected settlements with a high level of amenities.

The option of focussing growth along the A12 Corridor, identified as Growth Option B within the Strategic Growth Options Consultation document, is support. The access that the A12 and parallel trainline that run through this section of Brentwood Borough provide ensure that the area is well-connected and sustainable. Both the mainline railway and A12 provide efficient access to London, its associated national transport links, and large scale employment opportunities. It has been recognised that there are development opportunities surrounding suburban area, within the Green Belt.

**Dunton Garden Suburb**

The proposed allocation of between four and six thousand units at Dunton Garden Suburb is praised in terms of its recognition of housing demand. 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 Shenfield 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 Mr C.H. Courage in order to promote land at east of Hall Lane and west of A1023, Shenfield.

The land is in single ownership and has been previously submitted (SHLAA ref: G085) 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 available and achievable. The site was not considered suitable however for the following reasons:

*“Access to the site may be a problem as Hall Lane is very narrow and not suitable for development of this size. Development of the site would not relate well to the existing urban area and would form an unacceptable intrusion into the open countryside”.*

Given the potential for co-operation with the adjacent landowner, it is anticipated that access could then be provided for a large scheme directly from Chelmsford Road (A1023) which would offer a highway capacity more suitable for a development of this size. A site of this size can offer a modest extension to the urban area in a sustainable location and a flexible design to meet a range of local housing and community needs.

Shenfield provides a wide range of community facilities and services including a secondary school, two primary schools, restaurants, pubs and a variety of shops. Shenfield is in close proximity to Brentwood which provides a further extensive range of educational, retail and leisure facilities for residents. Buses run to Brentwood from a bus stop in close proximity to the site on the A1023 every 20 minutes. Shenfield railway station is also situated on the Great Eastern mainline and provides regular access to London Liverpool Street, as well as Ipswich and Harwich.

The site is adjacent to the existing settlement boundary to the east. The site presents a logical extension to the well-serviced village of Shenfield. 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 and west of the A1023 so a settlement extension here would reflect the existing development pattern and have minimal further impacts on the Green Belt. The site is also in proximity to Shenfield High School, and easily accessible from junction 12 of the A12.

With the potential for an access to be provided, 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 site is under the sole ownership of Mr C.H. Courage and they are fully committed to the delivery of development on this site. The allocation of this site is therefore considered to be sound and in keeping with 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)?**

The Strategic Growth Areas Consultation document at paragraph 3.3 recognises that objectively assessed housing needs are around 360 dwellings per annum, equivalent to approximately 5,500 homes over a 15 year plan period.

The plan also however recognises that to meet objectively assessed needs and account for past unmet need a higher level of growth is likely to be required. This is stated in the Council's evidence base to be in the region of 6,200 dwellings (413 per annum over a 15 year plan period). It is clear therefore that there remains a very significant need for housing with the Brentwood Borough. In order to meet this objectively assessed need it is important that the council allocate appropriate sustainable sites in all areas of the borough that can contribute to meeting needs whilst avoiding significant harm to the Green Belt.

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 considering suitable greenfield land opportunities.

Release of Green Belt sites should particularly 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.

Suitable sites such as our client's land at Shenfield are already well enclosed within the landscape and can be brought forward whilst avoiding harm to the Green Belt.

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

Yours sincerely,



**James Firth BA(Hons) MSc MRTPI**  
**Associate Planner**  
Strutt and Parker

Enc: Site Location Plan