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Planning Policy Team,
Brentwood Borough Council Town Hall,
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17th February 2015

Dear Sir / Madam,

Re: Brentwood Borough Local Plan - Strategic Growth Options Consultation/Dunton Garden Suburb Consultation – Land east of Horndon Industrial Park, West Horndon

I write in relation to the Brentwood Borough Council Strategic Growth Options Consultation. Strutt and Parker LLP are acting on behalf of The Croll Group, who own the land outlined in red on the enclosed plan.

The purpose of this letter is to outline the suitability of the land east of Horndon Industrial Park, West Horndon 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 West Horndon 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?*
- *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?*
- *In order to provide for local need is it preferable for Greenfield sites on the edge of the 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 within existing settlements in all three of the broad areas that can provide housing and community facilities in sustainable locations with favourable access to the transport network.

Deliverable sites within existing settlement boundaries should be considered as suitable sites for residential development in order to support the National Planning Policy Framework's (NPPF) recognition that *"residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites"* as stated in Paragraph 23.

It has been recognised in the Strategic Growth Options Consultation Document that the A127 corridor has a greater availability of land with potential capacity for growth than elsewhere and that the A127 has more scope for improvements than the A12.

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 West Horndon will not only help support the existing town, 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, in a sustainable well-connected settlement.



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

Strutt and Parker LLP are acting on behalf of The Croll Group in order to promote land east of Horndon Industrial Park, West Horndon. The land is in single ownership and has been previously submitted to the Council (SHLAA ref: G097) for consideration due to its potential to provide residential development. The Council has therefore previously considered the potential for this site and recognises that the land is available and achievable. The Council suggested that the site was unsuitable for development because: *“the site is designated as Protected Urban Open Space and is therefore not considered to be appropriate for development”*.

Aside of this, the site was considered achievable due to its siting on the edge of residential development and currently un-used status. It was suggested that a landscape buffer would be required for screening of residential uses and that connection to infrastructure and services would be relatively low due to existing residential uses nearby.

The site is fenced off however, not accessible to the public and disused. The site is well-screened by extensive planting on the northern and southern boundaries and with large industrial buildings to the west, any residential views from the east to west are limited. It is therefore proposed that the site’s current designation is lifted due to the limited influence of the site on local amenity. As this is the only significant constraint of the land recognised by the Council it is suggested that the land would be suitable for development following this proposed change in designation.

West Horndon is an established village on the southern boundary of Brentwood Borough. The village offers a local convenience store, a primary school, pubs and restaurants and other community facilities and services. Horndon Industrial Park provides a high level of employment. The village is served by West Horndon railway station which is situated on the London to Southend mainline. The railway provides a southern boundary for the village whilst the northern limits are bound by the A127 which runs between Southend and London. West Horndon is also served by a bus which runs at least once an hour between Brentwood and Grays. Brentwood offers an extensive range of further educational, retail and leisure facilities. The location of the village and its linkages to public transport make it a highly sustainable option for residential development.

Horndon Industrial Park was allocated as a mixed use site with the provision for 1,500 dwellings in the within the Brentwood Borough Council Preferred Options Location Plan. This is an option still under consideration however should a scheme come forward, the landowner’s site would be bordered on both sides by residential and mixed-use development and would therefore offer a logical opportunity for infill development that could contribute significantly to the housing needs of Brentwood Borough. This land should be allocated in order for the plan to effective in accordance with the NPPF.



The landowner is flexible with regards to the use of the greenfield site and has suggested the following options:

- Residential
- Mixed-use
- Employment
- Car parking
- Mixed-use allocation as part of the potential redevelopment of Horndon Industrial Park
- Public open space allocation as part of the potential redevelopment of Horndon Industrial Park

It has been recognised that the site, which currently offers very little benefit or amenity to local residents, could offer residential or community benefits.

Given the sites proximity to West Horndon Railway Station, it should also be considered that the site may be suitable for use as a car park in an area where parking is a recognised issue.

The site is under the sole ownership of The Croll Group 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.

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?

Land east of Horndon Industrial Park and the village of West Horndon is considered a suitable location for growth given its siting along the A127 and that it is served by a mainline railway line at West Horndon Station. This makes the village highly sustainable and therefore development here would be in line 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.

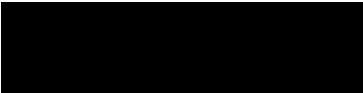


The objectively assessed housing needs for Brentwood Borough Council far exceed the availability of brownfield land in the borough. The council cannot provide a sustainable level of housing in the borough without considering suitable greenfield land opportunities. Sites should be considered where they are sustainably located and well-situated with regards to existing community facilities and services.

Our client's land presents an opportunity for development within a defined settlement boundary which would not require development of either greenfield or brownfield land within the Green Belt. The site is under-utilised and presents an obvious opportunity to relieve pressure on the Green Belt surrounding West Horndon.

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