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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 Parklands, High Street, Ingatestone

I write in relation to the Brentwood Borough Council Strategic Growth Options Consultation. Strutt and Parker LLP are acting on behalf of R.H. Currie & Co., 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 Parklands, High Street, Ingatestone 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 Ingatestone 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:

- *Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?*
- *Q3: Do you have any comments on the appropriateness of particular sites?*
- *Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?*
- *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)?*

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 suburban areas.

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 urban area, within the Green Belt.

As one of the largest villages in the Brentwood Borough, Ingatestone should be recognised as a key area for growth.

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 Ingatestone will not only help support the 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 R.H. Currie & Co. to promote land, that is in single ownership, at Parklands, High Street in Ingatestone. The site is situated on the northern edge of Ingatestone, between the A12 and the railway line, spanning an area of approximately 9.5ha.

The site is situated within the Green Belt however it is in very close proximity to the existing settlement boundary. The site would provide a logical extension to the well-serviced village of Ingatestone, one of the



largest villages in the Borough. The village offers two small supermarkets, pubs, restaurants, a chemist, several clothes shops, banks, a post office, specialist shops, a primary and secondary school, and other community facilities and services. Ingatestone railway station provides services to Ipswich, Chelmsford, Colchester and Harwich, as well services to London Liverpool Street at least every half an hour. The town is also directly accessible from the A12 and only 10 minutes from the M25. Ingatestone's amenities and transport connections make it a suitable location to allocate land to support the housing needs of the Borough.

The village is also in close proximity to Brentwood and Chelmsford which provide a further extensive range of educational, retail and leisure facilities for village residents. Chelmsford is 6 miles from the site, or 5 minute train journey. Buses run every half an hour between Chelmsford and Brentwood from a stop situated where the site's access road meets the High Street (B1002).

The site is adjacent to existing residential development and in very close proximity to the settlement boundary. Development here would therefore have minimal impact of the Green Belt and would be in-keeping with the existing settlement layout and pattern of development between the A12 and the railway line.

The proposed site fronts the High Street (B1002) and it is anticipated that an access would be provided from the B1002 into the site. A further assessment is required to confirm that this would be suitable however current visibility splays raise no considerable cause for concern. The site is well-screened from the railway line, and further landscaping and significant planting would be provided along the northern limit of the site to prevent visual impact on the surrounding open countryside and Green Belt.

The landowner has suggested that the site may be suitable for providing retirement accommodation. The site is easily accessible and a high level of local amenities would make the village suitable for accommodating people wishing to be self-sufficient with limited ability to travel. A bus service running from the site would also enable independence of residents, especially those that may not have access to a car. The landowner is flexible in how best to use the site however and aims to ensure that local housing, and other potential community needs are met to the best of the site's ability.

A site layout could be developed to reduce the impact of development on neighbouring residential properties, and to minimise any potential noise impacts on the development of the nearby railway line through the use of a substantial landscaping strategy in particular.

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 site is under the sole ownership of R.H. Currie & Co. 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.



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

The land at Parklands, Ingatestone is considered a suitable location for significant village growth given its siting along the A12 and that it is served by a mainline railway line at Ingatestone 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.

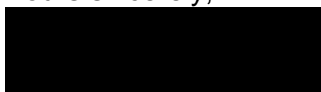
The objectively assessed housing needs for Brentwood Borough Council far exceed the availability of brownfield land in the borough. The council cannot provide a sustainable level of housing in the borough without considering suitable greenfield land opportunities.

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 Parklands, Ingatestone 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