

# Brentwood Borough Local Plan **Strategic Growth Options Consultation**

**Representations On Behalf of One Property Group Ltd  
In Relation to Land At Salmonds Grove, Ingrave**

Our Ref: C14109

**February 2015**





**Phase 2**

PLANNING &  
DEVELOPMENT  
LIMITED

Majesty House  
200 Avenue West, Skyline 120  
Great Notley, Braintree  
Essex, CM77 7AA

01376 332560

[office@phase2planning.co.uk](mailto:office@phase2planning.co.uk)  
[www.phase2planning.co.uk](http://www.phase2planning.co.uk)

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## Summary

The following response to the current Local Plan Strategic Growth Options consultation is made on behalf of our clients One Property Group Ltd, who as part of a number of sites within the Borough have an option on land at Salmonds Grove on the edge of Ingrave.

The site has been previously discussed with the Council, and was the subject of a response to the 2013 Preferred Options consultation.

The current consultation has reconsidered the Council's position, and it is noted that in going back to an options consultation it acknowledges that much has changed since 2013, in particular on meeting objectively assessed housing needs (OAN), which the Council recognises now need to be met on the basis that objections were received from neighbouring authorities because the Preferred Options document did not propose to meet all of the Borough's housing need. It also became clear that the consequences of failing to meet full need meant that several other authorities' plans were found "unsound" and could not be adopted.

It also recognised that there was the need to gather further evidence on economic issues, renewable energy, the impacts of Crossrail and Planning for Gypsies and Travellers, and also to consult on proposals to allocate land for development at Dunton up to the Brentwood Borough boundary.

It has been noted that the Council's assessment of OAN via Peter Brett Associates appeared on the Council's website on 13<sup>th</sup> February, 3 working days before the deadline for submissions. National Policy and Guidance as set out in the NPPF and Planning Practice Guidance that requires a Local Plan to be informed by robust and up to date evidence, and it is disappointing to note that with the exception of the SHMA update the rest remain unavailable, the consultation document stating that they are 'forthcoming'. Although the 'Objectively Assessed Housing Needs for Brentwood Borough' is listed within the document as December 2014, it does not yet appear on the Council's website.

In order to properly assess needs, constraints, and capacities and to properly establish a strategy based on these requires an up to date evidence base.

The following response will be set out within the context of the above, and under the headings of the Council's consultation.

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## 2 Managing Growth

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

***Q2: Do you agree with the issues raised for each of these three 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 Green Belt)?***

We noted that the 2013 Preferred Options consultation document proposed a spatial strategy that derived from an option to focus growth in Brentwood, Shenfield and West Horndon along with suitable developed sites in the Green Belt and brownfield development in other villages, but which was a variation on spatial option 2 (Transport corridor-led growth) as it proposed proportionately more growth at West Horndon because of the comparative capacity for growth in that location, and less growth in Ingatestone because of capacity and land constraints. However, we also noted that growth in and around Brentwood was limited based on a claimed lack of capacity in the Brentwood urban area and north of the Borough in terms of infrastructure such as roads (due to congestion), primary schools, GP facilities and a higher landscape value.

We note that the new consultation recognises that the level of growth required is now higher, specifically the need to meet full housing need, and that therefore, the previous strategy may not now be the most sustainable option.

Our comments on the 3 defined growth areas are as follows:

### **(A) North of the Borough**

The consultation identifies that this area is made up of a collection of villages set amidst attractive natural landscape; identifies that brownfield land is not readily available; and that transport connections and local facilities are not as good in this part of the Borough and so it would not be sustainable to locate significant growth in the area. On the latter it goes on to state that 'local roads provide access to connecting A-roads such as the A414, which provides access to the M11 and Chelmsford without driving on the highway network', which is not understood.

However, whilst we agree that it is important to consider allowing villages to grow in order to provide for local need, given the identified constraints in this area it is suggested that these needs be met by small scale exception sites in only those villages with a degree of services such as public transport, school and shops. These settlements should be specifically identified within the Plan, but it should be made clear that the overall Plan strategy should not rely on these as a source of housing provision.

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### **(B) A12 Corridor**

The consultation notes that the A12 Corridor contains a wide range of land uses; contains the Brentwood urban area, made up of Brentwood and Shenfield but also including Brook Street, Hutton, Pilgrims Hatch and Warley; and that there are development opportunities surrounding the urban areas, within the Green Belt. Apart from a comment on access to Brentwood from the A12, there is no assessment of the accessibility and service range of Brentwood and related urban areas, and it is important to note that Brentwood is where most jobs and services are located within the Borough, and therefore where growth should be concentrated in accordance with the mutually dependent sustainability objectives of the NPPF.

### **(C) A127 Corridor**

The consultation notes that the A127 Corridor contains the single settlement of West Horndon; has a different landscape character to the rest of the Borough; and that although the A127 suffers from congestion problems it has more scope for improvements than the A12.

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### 3 Sustainable Communities

The consultation rightly recognises that the Council is required to meet projected local housing needs and that the NPPF sets out that Local Planning Authorities should objectively assess their market and affordable housing need and provide for that in full.

The consultation states that the Council has commissioned a study to identify **objective housing need** for the Borough, which concludes a requirement to provide for around 360 new homes per year and that over 15 years that comes to around 5,500 homes, some 3,000 more than what can be provided from brownfield sites in urban areas. It also notes that the shortfall from previous years will also need to be taken into account in the future Plan period, which will increase the overall housing need figure and that if the Plan period is extended to 20 years then the need will also increase proportionately over that period.

The Council's assessment of OAN has appeared as part of the evidence a few days before the close of the consultation and as such has not been assessed within the following. We reserve the right to add an addendum to our representations on this basis.

An important consideration relates to the deliverability of sites, particularly early in the Plan process and particularly given the current 5 year housing land deficiency.

By its own estimates the Council is not able to demonstrate a **5 year land supply** against a target of 362 dwellings per annum plus a 5% buffer. This is set out in the Council's "DRAFT Brentwood interim five year housing land supply 2013 to 2018" document, which confirms that the Council can only demonstrate a 4.29 year housing supply. The Council acknowledges that it has failed to "identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing".

We note that the Council has identified the relevant five year period as 2013-2018 within its "DRAFT Brentwood interim five year housing land supply 2013 to 2018". However, we are now into 2014/15 monitoring year and therefore the requisite five year period is the monitoring years of 2014/15 to 2019/20. This requires 1901 dwellings (5 x 362 plus 5% buffer). The Council has also not produced completions data for 2013/14 but has forecast 186 dwellings projected supply for this period within the Annual Monitoring Report 2012/13, the Housing Completions update (April 2013) and Preferred Options Local Plan 2015-2030 draft document (July 2013). This therefore means by its own estimates there is a shortfall of 176 dwellings in the first of the five year period and this is required to be added into the 5 year requirement in accordance with the "Sedgefield" approach. This therefore requires a further 35.2 dwellings each year over the next 5 year period, so, 2085 dwellings in total (5 x 362, plus 5 x 35.2, plus 5% buffer) which requires 417 dwellings per annum.

Dealing with supply, we agree with the Council's approach to include within its supply 376 dwellings comprising sites with planning permission and sites with planning permission but where building work has yet to commence. However, we challenge the inclusion of sites proposed to be allocated in the Preferred Options Local Plan 2015-2030 (1256 dwellings in total) as this has been superseded by the current Plan consultation and fails NPPF paragraph 47 and footnote 11 that provide for a site to

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be deliverable (i.e. included in the five year supply) sites must be “available now”, “suitable now” and there must be a “reasonable prospect” of delivery of houses within 5 years.

We conclude on this issue that the Council can only robustly demonstrate at this time a 1.67 year supply of housing land, and that even if the Council was to include a windfall allowance within its supply, which is 48.6 dwellings based on last 5 years annual supply, this would only add a further 243 dwellings within the supply (48.6 x 5 years) a total of 944 dwelling which equates to a 2.25 years supply of housing land.

The consultation also states that it is also important to consider the need for more **affordable housing**, which it states is becoming more of a local issue as house prices increase.

The Council’s housing register as of November 2014 is noted as being made up of 567 people (i.e. those currently on the Council’s housing waiting list), whilst the 2013 Affordable Housing Assessment identifies a shortfall of 234 units per annum. The anticipated affordable housing target of 35% cannot therefore meet the Council’s projected annual shortfall based on a housing target of 360 per annum, particularly if current unmet need and projected future need are combined.

***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?***

The approach that should be taken in the Plan is to assess and include Green Belt sites identified as suitable, available and achievable within the SHLAA.

With regard to our client’s site at Salmonds Grove, the Council’s Strategic Housing Land Availability Assessment (SHLAA, extracts attached as Appendix 2) produced in 2011 recognised that this site is suitable, available and achievable and could deliver 44 dwellings within years 1 to 5 ie early in the Plan period. Within the assessment, it notes that the site is generally flat, although it sits slightly higher than surrounding development and any scheme would need to take this into account to preserve the landscape character. It goes onto state that development would also need to be restricted to the western part of the site to reduce the impact on the countryside and outward spread of the village. However, the site does have a good connection with the village and transport links.

In noting that the site is available for residential development, it considered that the site is achievable albeit constrained by the recommendation that only the front part of the site is developed (approx. 30% of total site) to avoid protrusion into the open countryside and to take into account the topography of the site and preserve the landscape character. A proposed layout plan of the site is attached with Appendix 1 which shows how this can be successfully achieved.



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## Conclusions & Changes to the Plan

In summary, although the move to recognise that Brentwood needs to meet its OANs is supported, the current consultation Plan is not backed by a robust evidence base and as such these cannot be properly evaluated, and growth options properly considered as a consequence.

However, notwithstanding this we would make the following points:

- Brentwood, including the extended areas of Shenfield, Hutton, Ingrave etc is where most jobs and services are located within the Borough, and therefore where growth should be concentrated in accordance with the sustainability objectives of the NPPF;
- The Council have a significantly deficient current five year housing land supply at present, and it is important to balance strategic allocations with smaller sites with few constraints that can be delivered quickly, such as the Salmonds Grove site;
- The current strategy of the Plan will not meet projected affordable housing needs in the Borough.

Notwithstanding the above comments on lack of evidence base, should the Plan progress to Preferred Options stage, we would request that it include the allocation of land at Salmonds Grove in accordance with our comments above, as shown on the plan attached with **appendix 1**.

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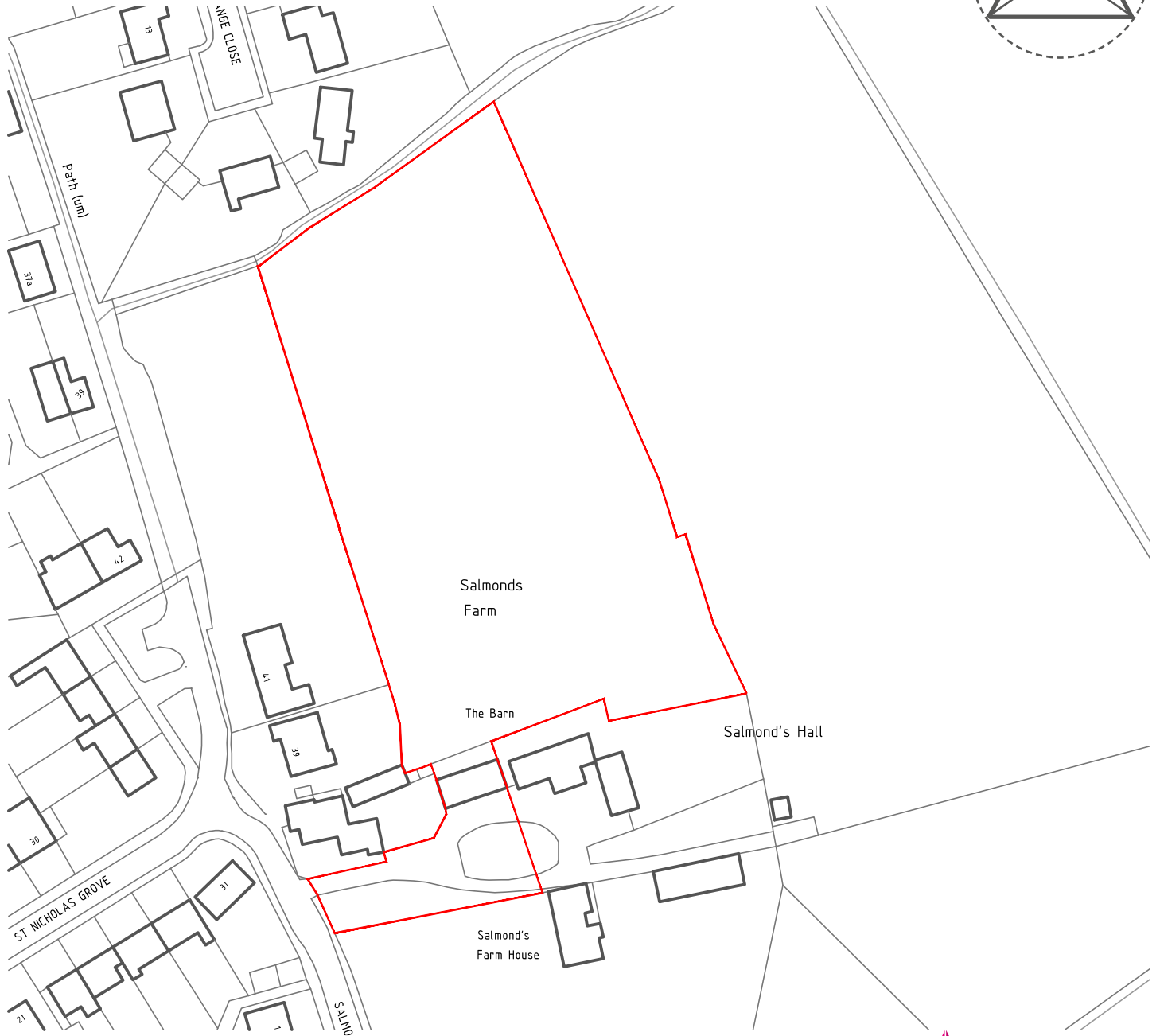
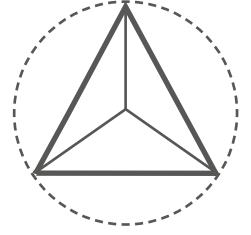
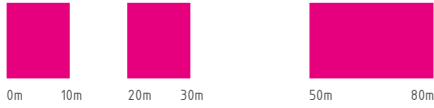
## Appendix 1

### Salmonds Grove Location Plan and Detailed Plan

# SALMONDS GRV, INGRAVE

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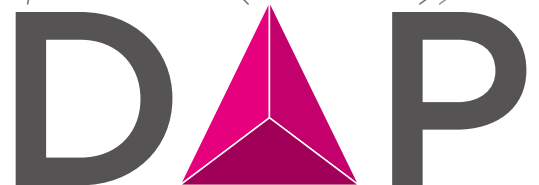


PROJECT  
RESIDENTIAL DEVELOPMENT

DRAWING  
AS EXISTING  
SITE LOCATION PLAN

CLIENT  
ONE PROPERTY GROUP

ADDRESS  
SALMONDS GROVE  
INGRAVE, BRENTWOOD  
ESSEX  
CM13 3RS



ARCHITECTURE LTD  
PROJECT NO. DWG NO. REVISION.

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e studio@daparchitecture.co.uk

t (0844) 854 9007

www.daparchitecture.co.uk

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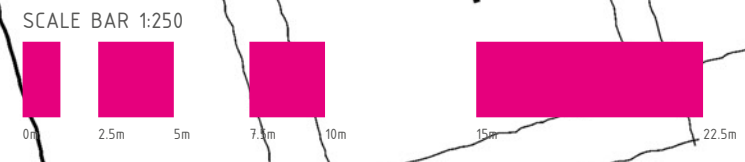
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# SALMONDS ROAD, INGRAVE

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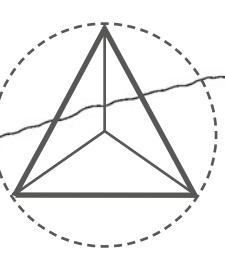
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SALMONDS GROVE  
SITE ENTRANCE

Salmond's Farm House

Salmond's Hall



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e studio@daparchitecture.co.uk t (0844) 854 9007  
www.daparchitecture.co.uk

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## Appendix 2

### SHLAA and Draft Site Assessment Extracts

Appendix 6: Potential Greenfield Sites

Location	Site Ref No	Site Name & Address	Site Area (ha)	Density Typology	Dwelling Capacity (Net)	Ownership Information (If Known)	Current Use	Suitable	Available	Achievable	Development Timescale					
											1-5	5-10	10-15	15 Years		
BWD	G007	Land at Honeypot Lane, Honeypot Lane, Brentwood	10.9	Medium	325	Barwood Land & Estates (current option on land)	Agricultural fields	Yes. The site comprises agricultural fields. The site would be suitable for development and would represent a good infill development. The site also lies in close proximity to public transport nodes, facilities and services. The development of the site would also be contained by the railway and A12 therefore development would not protrude into the open countryside.	Yes. The site is readily available for development.	Yes. The site is adjacent to an existing attractive residential development and is a large site, which would aid the sites achievability. However, consideration would need to be given to a buffer / screening as the site is bounded by the A12 to the west, although due to the size of the site this is unlikely to be too detrimental to the site's development. Cost of connection to infrastructure and services would be in line with what would be expected for a site of this size, as would any developer contributions required for the site. This site would be brought forward by a national house builder or a consortium.	*	(200)	*	(125)		
BWD	G008	Land off Doddinghurst Road, either side of the A12, Brentwood	7.2	Medium	216	Essex construction company	Scrub land / open fields	Yes. The site comprises scrubland and open fields. The site would be suitable for development and would represent a good infill development. Consideration would need to be given to a buffer / screening as both portions of the site are bounded by the A12 on one side. The site also lies adjacent to the urban area and is within close proximity to a number of services and facilities.	Yes. The site is readily available for development.	Yes. This site would infill a gap within the existing residential area, it is a large site and is considered achievable. However, dwelling numbers may be affected by the need for a buffer and screening requirements to the A12. Connection to services and infrastructure would be in line with that expected for a site of this size as would any developer contributions required. This site would be brought forward by a national house builder or a consortium.	*					
BWD	G022	Salmons Farm, Salmons Grove, Ingrave	3.65	Low	44	C. Lonergan	Pasture	This site comprises pasture land. It is generally flat, although it sits slightly higher than surrounding development and any scheme would need to take this into account to preserve the landscape character. Development would also need to be restricted to the western part of the site to reduce the impact on the countryside and outward spread of the village. However, the site does have a good connection with the village and transport links.	Yes. The site is available for residential development.	Yes, although constrained by the recommendation that only the front part of the site is developed (approx 30% of total site) to avoid protrusion into the open countryside and to take into account the topography of the site and preserve the landscape character. Connection cost to infrastructure and services are likely to be relatively higher due to the current site use. This site is likely to be brought forward by a medium size developer.	*					
BWD	G013	Sawyers Hall Farm, Sawyers Hall Lane, Brentwood	20	Medium	50	Tesco	Scrub / pasture / open fields / animal sanctuary (forms small part of site - vast majority is Greenfield)	Yes. A small part of the site bounded by the A12 to the north and development to the south and west is deemed to be suitable for development given the neighbouring urban uses. The site comprises a mixture of uses including scrub land, pasture, open fields and an animal sanctuary. The majority of this site is not suitable for development as it extends beyond the built settlement and into the green wedge between Shenfield and Brentwood.	Yes, the site is available for residential development.	Yes. Part of the site is considered to be achievable. Contamination at the site is unknown at present. Due to ownership and site size this site is likely to come forward from a medium sized developer.	*					



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