



SP/CAM.0114 Rev.B

17th February 2015

Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

Dear Sirs

**Brentwood Borough Local Plan 2015–2030 - Strategic Growth Options
Consultation on behalf of Martin Grant Homes**

Thank you for this opportunity to comment on the Brentwood Local Plan, Strategic Growth Options proposals. We submit comments on behalf of Martin Grant Homes who have land interests in Herongate, located between Heron Court and Billericay Road.

As you will see from the attached site location plan, our client's land extends in total to approximately 5.7 ha. Our representations relate to the suitability of the smaller parcel of land (1ha) adjacent to the existing settlement boundary for Herongate as being suitable and appropriate for residential development. The plan also shows a much larger parcel of adjoining woodland also owned by our clients. This may provide linked opportunities for enhancement as a woodland area and improved access to benefit the local community.

Our comments relate to the necessity for the Borough to provide appropriate housing allocations within their administrative boundary in order to meet their objectively assessed need and the current identified shortfall of 3,000 dwellings within the plan period.

5 year Land Supply and Objectively Assessed Need

Brentwood's Interim Five Year Housing Supply 2013-2018 (2014) identifies that during 2001 – 2012 the total number of housing completions in the Borough was 2533, 433 more than the RSS target (however, this was a constraints-based target now out-of-date). While the Borough under-delivered for three of those years, overall Brentwood has used their previous cumulative delivery rates to substantiate a 5% buffer when calculating their 5 year land supply. Despite this, the Borough is unable to demonstrate a 5 year supply, only 4.29 years.

Further to this, given the Borough's reluctance to release any appropriate land from the Green Belt, the five year housing land supply relies upon allocated sites on brownfield land. While the report highlights that the Borough does not consider that there are any constraints on these allocated sites that would jeopardise their delivery by 2018,

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realistically the nature of brownfield sites means that their deliverability can be uncertain.

Given that it is approaching two years into the five year period and few of these sites have delivered any housing, along with the fact that Brentwood is unable to demonstrate a 5 year housing land supply, we are of the view that it is imperative for a range of sites to be considered including appropriate Greenfield sites in order to bring forward an appropriate supply of housing and provide a more flexible approach to delivery.

The Objectively Assessed Need for the Borough has concluded that 360 homes are required per year during 2015-2030. The capacity of all Brownfield sites within urban areas in the Borough could provide for a maximum of 2,500 new homes, some 3,000 short of the total number needed during the 15 year plan period.

Growth within the A12 Corridor

The Strategic Growth Options document identifies proposed sites within the A12 Corridor that are either Brownfield sites within urban areas or to require the release of sites within the Green Belt that adjoin urban areas. The nature of Brownfield sites can mean that their deliverability is unpredictable due to existing operational uses, complex land ownerships, possible loss of employment uses and likely remediation works that would be required.

While our client's site has not been identified as an allocation, it is positioned adjacent to the urban edge of Herongate, which was identified as part of the 2013 Preferred Options, Draft Assessment as a Larger Village. Whilst Martin Grant Homes recognise the proposition that most new development will be focused upon Brentwood and Shenfield, the scale of the future housing requirements arising in the period to 2030 will inevitably require the considered release of land from the Green Belt in Larger Villages. It is considered that our client's site would provide an appropriate scale and balance of development in this vicinity which would meet the longer term needs of the Borough as identified in the objectively assessed needs study. It is considered that a limited release of land on the eastern side of the settlement between Heron Court and Billericay Road would not be in conflict with the Green Belt purposes identified at paragraph 80 of the NPPF.

The A12 Corridor is one of three broad areas that have been identified for growth within the Strategic Growth options document that use existing transport corridors. While we consider that the Borough has to consider growth in each of the broad areas in order to meet its objectively assessed need, the promotion of growth within the A12 corridor will enable improvements to be made to the surrounding transport network, possibly even to the A127, given the position of Herongate to the north.

Land at Herongate, Brentwood

It is considered that our client's site is sustainable as it abuts the existing development boundary of Herongate. Policy CP13 of the 2013 Preferred Options document proposes a

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Green Travel route passing through the village. The objective of this route is to link Brentwood town centre with strategic allocations at West Horndon to the south, thereby providing a sustainable public transport route. Development on the eastern edge of Herongate would be well placed to take advantage of the proposed Green Travel route.

Our client's site is a sustainable site that does not have any complex ownership requirements to obstruct its delivery. It is a Greenfield site that is not known to have any constraints such as remediation requirements that could impede its development. As such, given the sites sustainable location and its ability to be delivered within a 5 year period, it would assist with the delivery of homes for the Borough as identified within the objective assessed needs study.

Dunton Garden Suburb Proposals

From the consultation documents, it remains unclear whether the proposal for a Garden Suburb at Dunton is an alternative to development at other strategic sites in the Borough as suggested in the Strategic Growth Options document or as a means of providing some of the development need of both Councils as referred to in the Dunton Garden Suburb Consultation.

It would be concerning if Dunton Garden Suburb were solely relied upon to deliver the identified shortfall of 3,000 dwellings. This is because while the illustrative masterplan within the Garden Suburb consultation demonstrates some parcels of housing would fall within the administrative boundary of Brentwood, thereby assisting with the housing needs as identified within the OAN study, further information indicates that if approved, any development is likely to take a minimum of 8 years before anything could happen on site and a further 10-15 years before the development is completed. Therefore, if Dunton Garden Suburb is solely relied upon to deliver an additional 3,000 dwellings, a time delay of at least 8 years within a 15 year plan period would be detrimental to the Borough meeting its OAN.

Summary

To summarise, we fully support growth within the A12 corridor and specifically the ability of our client's site in Herongate to deliver a sustainable development on the eastern side of the settlement that would not be in conflict with the Green Belt purposes identified at paragraph 80 of the NPPF.

The allocation of sites such as land between Heron Court and Billericay Road will provide Brentwood with a range of sites that enable a flexible approach to housing delivery and ensures that land comes forward within the plan period. To rely upon Brownfield sites and Dunton Garden Suburb to deliver the required housing could mean that the housing may not be delivered within the 5 year period due to unknown constraint associated with developing previously developed land. For this reason, we consider that the identification of additional sites such as our client's land within Herongate should be thoroughly considered as it is deliverable within the shorter term and will assist with meeting the Boroughs objectively assessed need.

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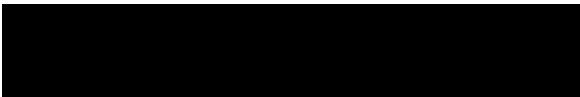
We also request that the future versions of the strategy are clearer regarding the Borough's approach to delivering the additional 3,000 homes. Is it proposed for Dunton Garden Suburb or other strategic allocations to deliver this additional growth or a combination of the two?

We consider this consultation for further sites to be a positive step by the Borough Council and a move towards meeting the Boroughs identified housing needs within its administrative boundary.

We trust that these comments are useful at this time and we look forward to being kept informed of the next stages of the Local Plan.

Yours faithfully

Sophie Pain
Senior Planner



c.c Haydn Payne, Martin Grant Homes