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PLANNING



Chater Homes

Brentwood Local Plan

**Representations to the
Preferred Options
Consultation
Regulation 18**

Chater Homes Ltd

Land at Beads Hall Lane
Pilgrims Hatch
Brentwood

October 2013

Introduction

This document has been prepared on behalf of Chater Homes Ltd and responds to the Brentwood Local Development Plan Preferred Options Consultation.

Chater Homes' interest relates to land at Beads Hall Lane, Pilgrims Hatch, at which Chater Homes seeks to deliver a high quality residential development which will include affordable homes, an extra-care senior living complex and public open space.

The draft Local Development Plan (LDP) outlines the Council's proposed vision, strategic objectives and spatial strategy for the entire Borough up to 2030. The consultation document includes policies against which planning applications will be considered and allocates a number of sites for development to achieve this vision. The LDP sets out the Council's preferred approach to delivering their objectives and the purpose of the consultation is to seek views on this approach as well as a range of alternatives.

This document makes representations to the Preferred Options Consultation in respect of Policies S2 and DM23, as well as presenting land at Beads Hall Lane as a potential alternative development site. This document provides background to the Beads Hall Lane site and a conceptual masterplan layout to demonstrate how a residential scheme could be delivered at this location. Chater Homes has previously made submissions to the SHLAA in respect of this site.

Chater Homes has an established reputation for developing well designed, high quality and award winning residential developments. Chater Homes has enjoyed a reputation as a house builder of quality for the past fifty years. They have become recognised for building communities by creating developments that harmonise with, and add interest to, their local context by incorporating local amenities such as woodlands, public open space and community facilities within their developments.

Land at Beads Hall Lane

The site subject of this submission is identified at Appendix 1. It is made up of parcels of scrubland and open field contained by extensive woodland boundaries. There is established residential development to the south and north. The site's connectivity to the rest of Pilgrims Hatch and Brentwood to the south demonstrates that this land offers a natural residential extension to Pilgrims Hatch.

Beads Hall Lane connects Hatch Road with Days Lane to the north. Hatch Lane is sufficiently urban in character to allow some relaxation of Green Belt policy to accommodate much needed residential development.

The settlement of Pilgrims Hatch

The residential area of Pilgrims Hatch comprises the Bishops Hall and Flower estates as well as a small rural area extending north to Ashwells Road and Days Lane. The area of Pilgrims Hatch forms a high-density residential suburb of Brentwood. There are local facilities including a general store, post office and public house located on Ongar Road as well as a primary school and pre-school to the south of the site.

There are junior schools nearby in Bentley and Doddinghurst with many senior schools in and around Brentwood.

Brentwood town centre is located two miles from Pilgrims Hatch and provides a full range of shops and services. Brentwood is situated 20 miles north east of Central London and is the principle settlement within the borough, located close to Junction 28 of the M25 Motorway in south-east Essex.

Brentwood is an affluent suburban town within the London commuter belt attracting a number of notable businesses including the Ford Motor Company UK headquarters, Equity Insurance Group, BT, BNY Mellon and Océ printing.

The primary shopping areas are located on either side of the High Street (A1023) which provides the central spine of development in Brentwood. Much of the town centre is designated as a Conservation Area and as a result is well maintained.

Transport Links

Brentwood has good road links via the A12 and easy access to the M25 at junction 28. Regular bus services operate connecting Brentwood with surrounding local village centres, as well as further afield to neighbouring towns including Billericay, Chelmsford and Romford. There are fast trains to London Liverpool Street Station as well as Ipswich and Norwich to the north.

Shops and services

Brentwood has a wide range of shops, services and community facilities. The Brentwood retail study undertaken by Chase and Partners in 2011 identifies that Brentwood benefits from having an attractive and pleasant town centre environment. It contains over two hundred and fifty retail units with a diverse retail mix. It includes many restaurants and bars and has a thriving night-time economy. Its key foodstore is Sainsburys, which is located to the north of the High Street.

Summary

The profile of Brentwood suggests an economically active and affluent population and a settlement that accommodates a good range of services, shops, employment opportunities and other facilities, which supports its status as the major settlement in the Borough.

The site at Pilgrims Hatch clearly represents an opportunity to accommodate much needed growth in Brentwood.

The Development concept

The illustrative layout concept shown at Appendix 2 of this document demonstrates a viable way of delivering high quality development at Beads Hall Lane. The concept responds to the surrounding context and setting whilst also taking full advantage of the existing woodland boundaries and mature trees within the site.

Access is taken from Hatch Road via Beads Hall Lane, with additional pedestrian access via a cycle and footpath at the eastern boundary of the site. The internal road layout has been designed to provide a range of street types.

The existing landscape features within the site have led to the development of a central green area intersected by the main access route, as well as a number of smaller green public open spaces across the site. Existing trees, hedgerows and woodland belts are retained within the development, and utilised as important features which will provide a level of maturity to the development. It will also help to contain the built development and provide a soft edge to the development to provide a gradual transition from the markedly urban area in the south to the countryside to the north.

The rural nature of the private road of Beads Hall Lane is retained as properties are set back away from this edge, behind existing trees and hedgerows.

The location of the site within the suburb of Pilgrims Hatch a short distance from Brentwood indicates that a density of 30 dph could be achieved. Overall it is anticipated that up to 150 dwellings could be delivered on this site, providing a range of accommodation types including affordable housing and extra care senior living.

In summary, the concept masterplan responds well to the existing physical context and surrounding land uses in this part of Pilgrims Hatch. The conceptual layout demonstrates that an appropriate balance can be struck between safeguarding the rural nature of the site and the appropriateness of the land for a residential extension to Pilgrims Hatch. The site adjoins existing residential development, is close to Brentwood town centre and is, therefore in an inherently sustainable location.

In the light of the lack of evidence to support the Council's preferred housing allocations, Brentwood Council should look to allocate the Chater Homes site at Pilgrims Hatch in its Local Development Plan. The site is available and deliverable and can be brought forward in the short to medium term and can provide certainty to the Brentwood Housing Trajectory in a sustainable manner.

Consultation response

This section of the report sets out the responses to matters raised in the Local Development Plan Consultation Document that are relevant to Chater Homes and their interests in Pilgrims Hatch.

General comments

There are examples where the text and policy appear to be 'justified' by anecdotal evidence, or forthcoming reports and studies. Such an approach is not consistent with the National Planning Policy Framework (NPPF).

Paragraph 158 of the NPPF, under the heading 'Using a Proportionate Evidence Base', requires that Local Planning Authorities should 'ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental prospects of the area. LPA's should ensure that their assessment of, and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

The following documents are listed in various sections of the LDP as forthcoming evidence:

- Brentwood Housing Strategy
- Infrastructure Delivery Plan
- Strategic Housing Market Assessment
- Traffic Modelling Work
- Utilities Assessment
- Landscape Sensitivity Testing and Green Belt Assessment
- Older Person's Housing Strategy
- Gypsy and Traveller Accommodation Needs Assessment

At mid September 2013 these documents had not been published. In our view these reports should have been published prior to consultation of the Local Development Plan Preferred Options document, in order that evidence supporting the Council's preferred options could be properly tested. In particular, given that 80% of the Borough lies within the Metropolitan Green Belt, the necessity for a Green Belt review is a fundamental issue.

We submit that the Local Development Plan housing figures are based on unsound assumptions and as a result housing allocation should be increased to ensure housing is brought forward to meet the requirements identified in the Heart of Essex Study. The evidence base cannot be considered up-to-date, robust or credible when it is still incomplete.

Policy S2: Amount and Distribution of Residential Development 2015-2030

The Plan makes provision for 3,500 new dwellings (net) to be built in the Borough between March 2015 and March 2030 at an annual average rate of 200 new dwellings 2015-2020, rising to 250 new dwellings 2020-2030.

The Council's estimated need for 3,500 homes is the same as that which was required under the now abolished Regional Spatial Strategy. Whilst it is acknowledged that in the absence of a regional plan Local Authorities are required to set their own housing targets, under the coalition Government, Local Authorities are being encouraged to increase the delivery of new homes. In most cases the demand for new homes, as measured by the Government, is higher than the former RSS target.

Brentwood Council, together with the adjoining Boroughs of Chelmsford and Maldon commissioned a report specifically to inform the three authorities on adopting new housing targets in the light of the abolition of the East of England Plan and its associated housing targets. In the case of Brentwood Council, the report was also intended to inform the Council's emerging planning policies.

The report was published in June 2012 under the title 'Heart of Essex Housing Growth Scenarios'. In relation to Brentwood, the report identifies that a much higher level of new homes are required than previously provided for in the RSS. The report suggest that 362 dpa are required. The figures identified in the report are based on CLG household projections, which are based on up-to-date data and are generally considered to be the most robust approach to determining housing need.

There is considerable disparity between numbers identified in the Essex Study which suggests that 5,430 are needed between 2015-2030 and Council's estimate of 3,500 homes

The report also identified the limited opportunities in Brentwood to deliver new homes without releasing Green Belt sites. By adopting a housing target that can be accommodated within recognised constraints, (i.e. the Green Belt) the Council will not be meeting the identified demand for new housing.

Given the Council's preferred strategy is one of restrained growth there is a concern that in this area of high demand for new housing, demand will outstrip supply. It is clear from the supporting text to the Policy that the proposed housing target has been influenced through engagement with the local community who strenuously object to any loss of Green Belt land.

It is evident from the 'Heart of Essex Housing Study' that the Council's preferred approach to housing delivery falls significantly short of the need for housing in the Borough and will in turn result in a density of development which will have greater adverse impact on the character of the local area, than if development was more dispersed and achieved through the planned release of appropriate Green Belt sites.

The National Planning Policy Framework states that the planning system should do everything it can to support sustainable economic growth and deliver houses. The Council should, therefore, have completed its Green Belt Review and Landscape Assessment in advance of

preparation of the LDP and identified suitable sites within the Green Belt to deliver the required additional housing.

Policy DM23 Housing Land Allocations – Major Sites

Concern is raised with regard to the mechanisms for achieving the supply forecast on the sites which are allocated.

Additionally, the forecast supply makes no allowance for permissions that will lapse. Given recent market conditions these assumptions are unsound. It would be appropriate to conclude that up to 15% of the outstanding planning permissions listed in the Housing Trajectory at Appendix 3 of the Plan will lapse.

As a result, a greater number of housing land allocations are required. The Plan would benefit from increased flexibility to ensure a continuous and rolling supply of housing land and the need for deliverable sites is met.

We do not believe that this can be achieved by Policy DM23, as there is too much reliance on the delivery of new homes on small brownfield sites, the majority of which are owned by the Council. The 3,500 target has only been achieved by maximising site densities to unrealistic levels.

The suggested densities as shown at Table 4 of the Council's Five Year Housing Supply Assessment 2012-2017, are on average between 60-80 dph, with some sites shown as high as 120-150 dph which is wholly inappropriate for this suburban location.

Furthermore, Policy DM23 should not refer to the allocated sites as major sites, as this is ambiguous. The majority of the sites identified in the policy are for between 10 and 20 houses, which in a built-up area like Brentwood does not constitute a major housing development.

Growth needs to be planned for, over and above the proposed allocations. The proposed strategy is not effective and there is a requirement for further contingency and flexibility within the Plan.

Conclusions

In its current form the Brentwood Local Plan is unsound and defies comprehension. We believe that Brentwood is capable of accommodating a greater level of housing in a more sustainable manner than is currently proposed by the Plan.

The site put forward by Chater Homes is deliverable within the plan period. The landowners and developers are committed to bringing the proposals forward. Development will provide for affordable and senior living housing in accordance with the Council's requirements. The site is in a highly sustainable location within the existing suburb of Pilgrims Hatch, adjoining existing residential development. The site lies in close proximity to a wide range of facilities and services and benefits from existing bus routes connecting the site to Brentwood town centre and the railway station.

Although this is a Green Belt site, it is important to recognise that there is insufficient brownfield land to accommodate housing requirements that have been forecasted for Borough and, therefore, sustainable and appropriate Green Belt sites such as this will have to come forward in the Plan period.

Appendix 1

Chater Homes

NOTES:
 1. This plan shows the proposed development.
 2. The site is shown as an outline on this plan. The actual boundaries of the site will be determined by the planning authority.
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Proposed Residential Development at Beads Hall Lane, Pilgrims Hatch, Brentwood, Essex

Project Title
**Chater Homes
 Land at Beads Hall Lane
 Pilgrims Hatch
 Brentwood
 Essex**

Drawing Description
OS Extract

Date
11/06/10 @ AJ

Drawn By
February 2010

Checked By

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