

## **Objection to Policy S2**

### **Inadequate Housing Provision**

The Council's proposed housing provision would fail to meet the objectively assessed housing needs for the District, as required by paragraph 47 of the NPPF.

The Council states in the plan that meeting its objectively assessed housing needs would require a rate of development of between 331 and 362 dwellings per annum for the period of the plan, yet its proposed provision assumes a rate of development of only about 233 per annum. This is woefully inadequate.

In order to meet its objectively assessed housing needs the Council should consider releasing sites on the edge of the larger villages excluded from the Green Belt, including at Herongate.

Inspectors' decisions on other local plans strongly suggest that the Council's argument, that it should not have to meet its objectively assessed housing needs because the District is tightly constrained by Green Belt, will not succeed. Nor will it be able to foist the requirement for meeting that need on other neighbouring authorities.

I attach a report to the Local Plan Cabinet Committee of Epping Forest District Council on 25 March 2013 which analyses the recent approach taken by inspectors when examining other local plans (**DOCUMENT A**). Epping Forest DC is similar to Brentwood, in that its rural area is entirely designated as Green Belt. But Epping Forest DC recognises and accepts, on the basis of recent inspectors' decisions, that it must plan to meet its own objectively assessed need unless it has an extremely strong justification.

### **Herongate Suitable Location for Development**

Herongate has a village hall, village stores, a post office, two churches, a range of clubs and societies, a football club, cricket club, and mobile library. The 565 and 265 buses provide weekday and Saturday services to Brentwood Town Centre, Brentwood Station, West Horndon Station and Lakeside Shopping Centre.

The village is on a major route linking Brentwood with the A127, and is only about 4kms from Brentwood and West Horndon Stations. Both stations allow easy access to the City of London in about 30 minutes.

The provision of more houses in Herongate would help support existing services and increase the demand for additional or expanded services.

In my view it is a sustainable development location.

## Objectors' Land Suitable Development Site within Herongate

The objector's land is opposite Button Common on the western side of the A128 near the southern entrance to the village (see aerial view at **DOCUMENT B**).

Brentwood Council's 2011 Strategic Housing Land Availability Assessment was very positive about the site's potential, stating as follows: -

*"Current Use: Overgrown site with two single storey garage type buildings.*

*"Suitable?: Yes, this site is overgrown with mature vegetation and with two 1950s single storey buildings. The site lies between two existing detached residential buildings, and fronts onto Brentwood Road, the site lies adjacent to the village envelope and is in close proximity to the existing services and facilities. There are no environmental constraints or other designations affecting the site. This site is suitable for residential development in keeping with the neighbouring properties.*

*"Available?: Yes, the site is vacant and therefore appears to be available for residential development.*

*"Achievable?: Yes, the site is located within a attractive residential area. However, the site borders a conservation area and area of historic interest and lies next to a sewage pumping station. There is unlikely to be any contamination on the site. Cost to connect the site to infrastructure and services should be relatively low due to its proximity to the adjacent village. Due to the size of the site it is likely to be brought forward by a small developer."*

The site lies between an existing ribbon of residential development to the north, which is within the village envelope, and an existing detached house to the south. The rough vegetation previously on the frontage of the site has been removed. The western part of the site remains thickly wooded and lies within the Thorndon Park Conservation Area. The proposed development on the site would be limited solely to the part of the site which is outside the Conservation Area. The development site would be well defined by firm features on the ground (see plan at **DOCUMENT C**).

The site would be served by a single new access from the A128. Highways officers have been consulted and we are confident a safe and suitable vehicular access could be provided. The objective would be to maintain as much as possible of the existing roadside hedgerow screen. If it were necessary to remove some of the hedge to provide sight lines, new hedgerows would be planted behind the sight lines.

It is important that the Council plans for a suitable range and mix of houses, and the objection site, with its good access to Brentwood and West Horndon Stations, is well-suited to a development of 5 or 6 detached family houses (see suggested layout at **DOCUMENT D**). This would be in keeping with the existing development to the north of the site, which consists of detached houses in large plots.

In conclusion, policy S2 makes inadequate provision for housing to meet the District's objectively assessed housing needs. Herongate is a suitably sustainable location for a limited amount of proportionate development, and the objectors' land could accommodate such development with limited impact on the Green Belt and Thorndon Park Conservation Area.