

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 Doddinghurst.

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.

Doddinghurst Suitable Location for Development

Doddinghurst is a thriving community with a village hall, three churches, two pre-school nurseries, a wide range of clubs and societies, a football club, doctors' surgery and mobile library. The 261 Bus service provides 12 buses per day to Brentwood town centre and station and 10 on Saturdays. There is a small group of shops near the village hall and church at the north end of the village (including a newsagent, a barber, a beauty salon, a pharmacy and an off-licence), while on Church Lane there is an estate agent, a clothes shop and a fish bar. There is a post office in the Doddinghurst Stores in Doddinghurst Road.

The provision of more houses in Doddinghurst 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 Doddinghurst

The objector's land east of Peartree Lane and north of Peartree Close, which has an area of 1.94ha, could be developed with about 50 dwellings. This would be a modest, proportionate

extension to the village, and would have only a limited impact on the Green Belt (see illustrative layout plan at **DOCUMENT B**).

Part of the site is used for grazing sheep and chickens on a non-commercial basis, but the site also includes two residential dwellings at 77 and 79 Peartree Lane (Sunnyview and Roseacre). These two dwellings constitute previously developed land.

Within the site, to the east of the garden of 77 Peartree Lane, is an area of about 0.15ha which is covered with buildings. These were originally built as piggeries, but have not been used as such for nearly 50 years. The current owner has used them for storage purposes related to his building business for the last 35 years. The buildings are run down and significantly detract from the appearance of the area (and already impinge upon the openness of the Green Belt). The presence of these buildings and their run down condition enhance the case for the site's allocation for new development. See aerial view at **DOCUMENT C**.

Lime Grove and the east-west section of Peartree Lane, are a normal width for residential roads and both or either could be used to safely access the site.

The dwellings on the western side of Peartree Lane facing east across the site are at a raised point in a gently undulating landscape. Opposite these dwellings, on the higher part of the site, it is proposed that a children's play space should be provided. This would be in accordance with paragraph 4.139 of the Draft Plan which states: -

"Provision of new children's play spaces will be encouraged particularly within the residential areas of [inter alia] Doddinghurst".

The site as a whole is roughly triangular with fairly dense residential development on two sides and five long narrow residential plots backing on to the third side. The site is therefore surrounded by residential development.

It has limited constraints. The brook which forms the southern site boundary is a tributary of the River Wid, but the objectors have never known it to breach its banks. Clearly it would be necessary to design a sustainable drainage scheme for the site, but there is no evidence of flood risk that would make the site unsuitable for development.

There are some existing trees on the site, but not so many as to represent a major development constraint. These can be surveyed and protected as necessary, as can any important wildlife habitats, and I am sure any new residential scheme would include provision for additional native species landscaping suited to species already found locally.

There is no commercial agriculture on the open land at the site and the owners would be happy to see the site developed. The site is available immediately.

In conclusion, policy S2 makes inadequate provision for housing to meet the District's objectively assessed housing needs. Doddinghurst is a suitably sustainable location for a

limited amount of proportionate development, and the objectors' land could accommodate such development with limited Green Belt impact.