

CB/159/30/3

23 March 2016

Planning Policy Team
Brentwood Borough Council
Town Hall
BRENTWOOD
Essex
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Email: planning_policy@brentwood.gov.uk

BY EMAIL

Dear Sir/Madam,

RE: BRENTWOOD DRAFT LOCAL PLAN 2013-2033 CONSULTATION – JANUARY – MARCH 2016- REPRESENTATIONS ON BEHALF OF ASPHALTIC DEVELOPMENTS LIMITED

We act on behalf of Asphaltic Developments Ltd and have been instructed to submit representations to the above consultation.

As you are aware, our client has an interest in the Brentwood Leisure Park at Warley Gap, Brentwood ('the Site') which is detailed on the enclosed site location plan (drawing ref: 159/30/3_SLP01).

We previously submitted representations on the Preferred Options Local Plan consultation document in October 2013 and Strategic Growth Options consultation in January 2015, to promote the Site's opportunity for housing development to be considered in the emerging Local Plan.

We therefore request that the contents of this letter are taken into account as well as our previous representations in the preparation of the Local Plan.

Redevelopment of Previously Developed Land / Green Belt

The Site is a leisure park, comprising a ski and snowboard centre, a driving range with covered bays, a restaurant, a vacant indoor leisure centre, kart track/centre with a sales/reception building, and parking areas. It is situated to the south of Brentwood Town Centre, within the Metropolitan Green Belt. The Site excluding the wooded area (2.2ha), which is considered to be developed most readily, extends to circa 5.6ha. This represents brownfield land - previously

developed land ('PDL'), as defined by Annex 2 of the National Planning Policy Framework ('NPPF') as:

"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although this should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface structure."

Paragraph 5.16 and Figure 5.4 set out the Council's proposed spatial strategy to consider land uses sequentially, and "Brownfield Sites in Green Belt" are identified as sequentially preferable to Strategic Sites and Greenfield Sites in Green Belt (as defined as urban extensions). We support this approach in principle, as it promotes the sustainable patterns of development to accommodate growth/development needs without encroaching onto Greenfield land.

"Brownfield Sites in Green Belt" are defined as *"previously developed sites adjoining existing urban areas within reach of services and infrastructure."* However, we consider that brownfield sites in Green Belt that are connected to, or close to, urban areas are sustainable urban extensions, and as such they should be released to meet the housing requirements of the Borough before releasing Greenfield sites. As such, we consider that the definition of "Brownfield Sites in Green Belt" is not appropriate, and should be amended as "previously developed sites connected to or close to existing urban areas."

We support Policy 9.11, which supports the principle of reuse/recycling of brownfield land/PDL in Green Belt to meet the Borough's housing and employment needs, provided that, inter alia, it will not have significantly greater impact on the openness of the Green Belt.

Notwithstanding that the reuse/recycling of brownfield sites in Green Belt is identified as sequentially preferable sites than strategic sites or greenfield sites in Green Belt, the Local Plan's Spatial Strategy under Policy 5.1 does not reflect this sequential approach to meeting local needs (for which no definition is given and appears to be contrary to the NPPF referring to 'local needs' relative to the housing needs in rural areas). We therefore consider that Policy 5.1 should be amended, which is also necessary in order to ensure the effectiveness of Policy 9.11.

Furthermore, given the Council's reliance on greenfield urban extensions in Green Belt (18% of total net homes to be delivered), it is considered that more sustainable sites which do not have significantly greater impact on the openness of the Green Belt, such as our client's Site, should be considered as potential sites for housing development (in line with Policy 9.11), in addition to the proposed allocations in the Green Belt, such as sites no. 010 and 128, which are brownfield land in the Green Belt that are connected to or close to urban areas.

Overall, the current Draft Local Plan does not provide applicants with clarity on the Council's approach to the development of brownfield land/PDL in the Green Belt notwithstanding Policy 9.11. It is considered that Policy 9.9 provides conflicting advice on development of brownfield land/PDL and Policy 9.11, as it states that development within the defined Green Belt including re-use or extension of existing buildings is defined as "inappropriate." This is contrary to the NPPF which clearly states at paragraph 89 that *"partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it*

than the existing development" is not inappropriate development in Green Belt. As such, Policy 9.9 requires amendments to ensure that it does not conflict with the strategy/sequential approach at Paragraph 5.16, Policy 9.11 and national policy.

Policy 9.12 states that the sites allocated for housing development in Green Belt will be de-allocated from Green Belt and provide new defensible boundaries to protect open countryside for future generations. Our client's Site is suitable for housing development as it is brownfield land/PDL, close to and well connected to the existing urban boundary of Brentwood. The site can sustainably accommodate residential development, without adversely affecting the openness of the Green Belt. As such, the Site should be allocated under Policy 9.12, as it offers significant potential to contribute to the Borough's housing requirements.

Open Space, Community, Sports and Recreational Facilities

It would appear from the Council's evidence base documents list that there is no up to date evidence to inform Policy 10.9 which includes "a presumption against any development that involves the loss of open space, community, sport, recreation or play facilities."

There are exceptions to the presumption under this policy, where it can be demonstrated that there is an excess provision or where alternative facilities of equal or better quality and convenience will be provided as part of the development. On this point, any alternative open space provision which could be brought forward as part of redevelopment should be considered alongside other sustainable benefits associated with recycling of the brownfield site for housing development, and this should be reflected in the Policy.

Conclusion

We respectfully request that the Council considers the representations in full and that those considerations will be reflected in the next stage of the document's preparation. We request that we are kept informed and updated of the forthcoming stages of the preparation of the Brentwood Borough Local Plan.

We will be pleased to provide further information or explanation on these representations should it assist. In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise, marked for the attention of Wakako Hirose at this office.

Yours faithfully