

Dear Sir,

Brentwood Borough Council Local Development Plan, February 2016

Objections to the Proposed Housing Development at Priests Lane, Site References 044 and 178.

We are the Priests Lane Neighbourhood Residents Association and we are writing to object to the inclusion of the above site in the Local Development Plan as set out in that plan.

SUMMARY

We feel very strongly that the above site **should not be included** in the development plan. There are several objections that arise for this particular site:

- 1 the site has value to the community as a protected open urban space and this designation should not be removed; if the urban population is increasing such sites will have greater value and to concrete over them is short-sighted planning;
- 2 it will result in an unacceptable increase of traffic on an already busy road, at a site which has seen a number of traffic accidents due to the layout of the road and speeding traffic, a further junction or increased traffic accessing Priests Lane at existing junctions will create further safety issues;
- 3 it will have an adverse effect on traffic conditions at the junction with Middleton Hall Lane, which already has safety issues due to the level of traffic at peak times;
- 4 it will have an adverse effect on the health and enjoyment of residents from excessive noise and vehicular movements and damage to the environment;
- 5 it will increase pollution in an area, and this area already has high levels of nitrogen dioxide near the junction with Middleton Hall Road;
- 6 a high-density development in this area will have an unacceptable effect on the visual amenity of the area, and will not be in keeping with the area as a whole;
- 7 it will not be sympathetic to the current fauna and flora on the site, and will reduce biodiversity in this area;
- 8 it will place an unacceptable strain on utilities such as sewerage water supply and electricity, which are already struggling to meet the area's needs;
- 9 the development at this site fails to meet the several of the Council's policy objectives as set out in the Draft Plan.

We consider that the proposed development does not meet the criteria laid down by the Brentwood Borough Council, nor does it meet relevant sustainability conditions, and therefore the proposed sites 044 and 178 should be removed from the list of the proposed development sites.

The reasons and evidence for our submission and our objections are set out in more detail below.

PROTECTED OPEN URBAN SITE DESIGNATION

The site is currently protected from development as it has been previously recognised as having value to the community in retaining open spaces with the Brentwood and Shenfield area. Indeed, this is one of the few remaining open greenbelt sites within the urban community, and forms part of a series of undeveloped plots of land that separate Brentwood from Shenfield, so preventing it becoming one sprawling conurbation. Policy 9.1 states that the Council is committed to safeguarding the diversity and local distinctiveness of the Borough including biodiversity and habitats, and recognises the importance of retaining the individual identity of separate settlements and parts thereof. Policy 9.8 states that greenbelt land will be maintained in order to preserve the Borough's special character and to "prevent the coalescence of settlements". Therefore retaining this site as a protected open space is in keeping with this policy objective.

It is not sufficient that greenbelt land is only protected at the edges of the community or in the villages; it is important the few greenbelt spaces within the town continue to be protected to sustain the quality of life within the town. The site is a playing field, and although the Ursuline School has chosen not to use it as such at the moment, we do not feel that it is right to irrevocably deprive the community of such an asset by development.

The Strategic Housing Land Availability Assessment from October 2011 discarded this greenbelt site as unsuitable for development stating "the Council's open space audit values the site's contribution to open space provision within the area". We are not aware of any changes in circumstances that would make this open space no longer of value, especially given the increasing development of the town.

When publishing the Natural Environment White Paper, Communities and Local Government Secretary Eric Pickles said: "Green spaces are incredibly important to local life which is why this government is committed to protecting them. These are special areas that invigorate communities like local beauty spots, wildlife habitats or even local playing fields so important for healthy activities." If the designation is removed, we will be contacting our local MP and the Secretary of State to review the decision of the council as we consider it detrimental to the community.

We consider that the designation of this site in the table (figure 7.2: Housing Land Allocation) as an "Urban Area" is misrepresentative, as it implies it is not undeveloped green belt land, and as a result there is an understatement of the amount of dwellings being built on greenfield/greenbelt sites.

The site currently provides habitat to wildlife and flora. There is significant evidence that it is a badger habitat, muntjac deer use the area and regularly visit houses along the road, as well as other wildlife such as foxes, shrews, voles, grass snakes, hedgehogs, bats, owls, robins, wrens, goldcrests, starlings, blackbirds, herons, black caps, green woodpeckers, lesser spotted woodpeckers, three types of tit and skylarks. There are a number of mature trees and a good variety of flora, including flowering meadow plants, which we think may include some rare species. Development on this land would have an adverse effect on this wildlife. Policy 9.1e states that the Council should be "conserving and enhancing biodiversity and habitats, including through the creation of new habitats". I cannot see how development of this greenfield site would meet these policy objectives.

TRAFFIC CONCERNS

The proposal is for 130 dwellings plus sports facilities or some sort of open space amenity.

The housing will be approximately a mile from the local amenities, being Brentwood and Shenfield high street shops, and about a mile from the local train stations. Priests Lane is not on any bus route. Further, the lack of pedestrian pathways along the road gives many pedestrians concerns over safety, particularly at the crossing points, which are on bends in the road. Therefore it is to be expected then that the people living in this new development will have at least one car per household (and in Brentwood this will often be more than one car per household), and will drive regularly.

In addition, there may be traffic associated with a sports facility built on the site.

It is therefore clear that a housing development of this size on the site will have a significant impact on traffic.

Priests Lane is already well known for its traffic problems:

- heavy congestion in the mornings, with traffic often queuing from the junction with Middleton Hall Lane at least as far as Glanthsams Roads, and sometimes further;
- speeding traffic at off-peak times;
- poor visibility for residents trying to access the roadway from junctions or side roads;
- heavy traffic and poor visibility for pedestrians crossing, often on bends where the pedestrian path swaps from one side to another;
- traffic accidents due to speeding and/or errors from difficulties with visibility; and
- heavy pollution due to queuing traffic, especially at the junction with Middleton Hall Road, but also along the road during morning rush hour.

Increasing the traffic volumes will worsen these problems, and so have an adverse effect on both the residents and other users of the road, in particular with relation to safety and air quality.

The access onto the proposed site is unclear. Both Bishop Walk and St Andrews Place were designed to be cul-de-sacs, and do not appear to be of sufficient size to accommodate the new traffic. The Council's Draft Site Assessment acknowledges that the current access is limited, and so may require road-widening works. A potential access to the site from the land opposite number 74 would be blind, likely to be dangerous, and may struggle to cope with the volume of traffic as it may be the only access point to and from the development. The position of these turnings, together with the heavy volume and fast travelling traffic, could make access from the site difficult for residents, as many residents already have problems turning onto the road. In addition there have been a number of traffic accidents over the last few years along this particular stretch of road, for example:

- a car skidded into number 49a (on the corner of Bishop Walk);
- a car drove into the hedge outside number 61;
- a car hit the BT box outside number 59;
- a car crashed into the wall at number 57, partly demolishing it;

- a car hit the side of the road between number 62 and number 64, spinning across the road and crashing at number 57 (happened 13 March 2016);
- a number of accidents and collisions at the junction with St Andrew's Place.

The number of accidents along the stretch of road where the site will be accessed indicate that there is already a road safety problem that will only be worsened by this development.

POLICY 6.3: GENERAL DEVELOPMENT CRITERIA

The proposal for the site in question is for 130 dwellings, at a suggested density of 96 dwelling per hectare. This is the third highest density in the plan. The surrounding area has a much lower density, probably less than half this density. The SHLAA indicates that such a level of density would be achieved through flats and terraced housing. This would be a very different type of housing from that which currently exists in this area and is entirely inappropriate. The plan suggests that this level of development is required only where there are good transport links, but we would argue that this site has limited transport links, in particular there could be access problems for disabled or elderly residents unless the road problem on Priests Lane can be solved.

Policy 6.3 states: Proposals for development will be expected to meet all of the following criteria:

a. have no unacceptable effect on visual amenity, the character or appearance of the surrounding area;

The development will have an unacceptable effect on visual amenity for the residents. The area around the site has not been densely developed and is notable for the individual design of the housing, which provides a distinct aesthetic identity, which adds to the character not only of the road, but for the whole Borough. One of the charms of this area is the feeling of space and the varying nature of the houses, which attracts people to the area. A development of the nature proposed would not be in keeping with this character and so would not meet this objective.

b. provide satisfactory means of access to the site for vehicles, cyclists and pedestrians and parking and servicing arrangements;

The existing roads of Bishop Walk and St Andrews Place were designed as cul-de-sacs, Bishop Walk is particularly ill suited to heavy traffic. The site map shows a possible access point directly from the road at 61a, but a junction at this point would be blind. The area already has a number of junctions onto Priests Lane, site 61a is very close to the junction with Glanthsams Road. Another road junction will add to the problems not only for access to and from the site, but also for residents turning onto the road safely, who struggle with poor visibility of oncoming traffic especially given that traffic often travels well in excess of 30mph.

Although it may be possible to provide pedestrian and cycle ways on the site, the residents only access to and from the development is by using Priests Lane which does have limited pedestrian footpaths and no safe cycle paths.

Parking would be of significant concern, as any parking overspill onto Priests Lane would cause significant traffic problems.

c. ensure the transport network can satisfactorily accommodate the travel demand generated and traffic generation would not give rise to adverse highway conditions or highway safety concerns or unacceptable loss of amenity by reason of number or size of vehicles;

This point has already been addressed, and we consider that the development would give rise to adverse traffic conditions.

d. have no unacceptable effect on health, the environment or amenity due to the release of pollutants to land, water or air (light, noise pollution, vibration, odour, smoke, ash, dust and grit);

e. cause no unacceptable effects on adjoining sites, property or their occupiers through excessive noise, activity or vehicle movements; overlooking or visual intrusion; harm to or loss of outlook, privacy or daylight/sunlight enjoyed by occupiers of nearby properties;

Heavy construction work will create pollution, and traffic concerns as already outlined will also give rise to an increase in pollution. The area around junction of Priests Lane and Middleton Hall Lane has one of the highest pollution levels in Brentwood, and we are aware that some sites already exceed the legal level of 40 micrograms of nitrogen dioxide per cubic metre of air. This means that increasing traffic in this area could mean unacceptable levels of pollution both at the junction and along the road. Given that the site is an undeveloped open space, the adjoining properties will inevitably have a loss of outlook and reduced enjoyment from increased light and noise.

f. take full account of opportunities to incorporate biodiversity in developments;

The site is used by a variety of animal and birdlife, development will inevitably reduce biodiversity in this case, see comments above.

g. when considering the impact of development on the significance of a designated heritage asset, greater weight should be given to the assets conservation and enhancement;

h. result in no net loss of residential units; and

i. new development would be required to mitigate its impact on local services and community infrastructure.

Development should not harm the amenities of occupiers in nearby properties. Therefore, protecting the privacy and amenity space of nearby properties by avoiding excessive overlooking or loss of light resulting from new development are key considerations. New development should be sympathetic to the character and form of neighbouring properties and surroundings ensuring they are not overbearing and do not look out of place. New development is likely to result in some impact or change, but this should be limited wherever possible and not be unacceptable

In view of the existing nature of the site and the difficulties that will arise from development, it is difficult to see how this proposal meets the policy guidelines. It is unlikely that the development as proposed would be in keeping with the existing housing in the area, as this would indicate a development of 40-50 houses. Further, the information in the appendices to the plan indicates a density of 96 dwellings per hectare, suggesting only half the site will be utilised, which raises concerns about the future development of more houses on the remaining land.

As the development of the site does not meet the Councils policy standards, we consider that the site should be rejected as set out in the plan.

SUSTAINABLE TRANSPORT

Policy 10.1 states that “future developments will be located in accessible locations to help reduce the need to travel. Where travel is necessary public transport, walking, and cycling will be promoted as alternative means on transport”. Although the sites

may appear to be close to the town centre and to train links, as residents, we know that walking is often not easy or convenient. There are no bus links, and a new development will result in increases in car travel. The design of the road combined with traffic volumes makes cycling unattractive for many, and there is no space for the provision of cycle lanes. Frequently cyclists and pedestrians share the same single pavement.

Similarly access would be limited for elderly or disabled residents. The pedestrian route to Shenfield High Street requires residents to cross a busy road on a bend. In addition, the pedestrian routes to both Shenfield and Brentwood have a single pedestrian pathway, which itself can be very narrow and could cause difficulties for users of wheelchairs and mobility scooters.

GENERAL INFRASTRUCTURE CONCERNS

The land in this area can be very wet, as it is clay based and has poor drainage. Indeed, development of this site was discussed a number of years ago, and but not taken forward due to advice that the land was too wet to develop. The open site currently absorbs water that would otherwise drain onto the back gardens on Priests Lane or onto the railway. We are concerned that building across this land could have an adverse effect on the properties backing onto this site if drainage is not properly managed. In addition there are a number of places along the road that suffer surface flooding after heavy rainfall, indicating that drainage in this area is struggling to cope.

We have been advised that sewerage in the area is operating at maximum capacity, and may already be exceeding capacity (Sustainability Appraisal 2015). The development will put further strain on these facilities.

In addition, the area is well known for problems with gas leaks, and fluctuations with electricity supply, and poor water pressure. In addition residents have been advised by the utilities that the supply lines are in some disrepair, notwithstanding the regular maintenance work undertaken. Developing this site will put further strain on these utilities, compromising the service that residents receive.

The plan refers to this site having open space or a sports facility. The lack of specifics is unhelpful. While open space is to be welcomed, any sports facility that would increase traffic, noise or light pollution would be detrimental to the area.

It is clear that the infrastructure in this part of Brentwood is struggling to cope with our current demands. As noted in the Plan, primary schools are at capacity, as are GP surgeries. Hogarth Primary School is already planning to extend, but that is to meet existing needs and may not be able to cope with additional increased demands on resources. We would also point out that this extension is planned on the existing school site, so diminishing further the green spaces in this area. If the population of Brentwood is expected to increase, then schools will likely need to increase with a corresponding need for playing fields. To remove this asset at this time appears to be short-term opportunism.

An increase in the population in this area will put more strain on already overstretched services.