

[REDACTED]

From: Chloe Sanders [REDACTED]
Sent: 22 March 2016 20:24
To: Planning Policy Team, Brentwood Borough Council
Subject: Brentwood Borough Council Local Development Plan, February 2016 - Objection

Follow Up Flag: Follow up
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Development Plan, February 2016 - Objection

From: Chloë Sanders, [REDACTED].

Dear Sir/Madam,

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

I am writing to object to the inclusion of the above sites 044 and 178 in the Local Development Plan, as set out in that plan. My reasons for objection are set out below and all references, both numeric and alphabetical, relate to the referencing detailed in the current Local Development Plan.

Brentwood Borough Council Local Development Plan, February 2016

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

In relation to **POLICY 6.3: General Development Criteria published in February 2016** my objections to the proposals for the building of 130 dwellings on the sites (**References 044 and 178**) are that the development:

- a. **WILL** have an deleterious effect on visual amenity in that the dwellings will occupy currently designated Protected Urban Open Space and will be out of character with the appearance of the surrounding area;
- b. **WILL NOT** provide a satisfactory means of access to the site for vehicles, cyclists and pedestrians, since Bishop Walk and St. Andrews Place are self-contained cul-de-sacs, serve a limited number of dwellings and are designed to accommodate the specific number of properties in those roads. These two roads could not cope with a further (potentially) 130 vehicles per day. The provision of (currently non-existent) access to Proposed Sites 044 and 178 would require major road widening works. The Council's **Draft Site Assessment** acknowledges the limited access available currently. Any access onto Priests Lane from the track opposite No. 80 Priests Lane would be blind, positively dangerous and struggle to cope with (potentially) 130 vehicles per day;
- c. **WILL NOT** ensure satisfactory accommodation of travel demand and traffic generation. Current traffic movement in Priests Lane is already very high and the additional pressure of a further (potential) 130 vehicles (or more) per day would produce an unbearable strain on a relatively narrow lane. Highway safety would be

further compromised, given that Priests Lane does not have pavements on both sides of the Lane for much of its length. Furthermore, the Council acknowledges concern over the capacity of the junction at Priests Lane/Middleton Hall Lane to deal with additional traffic (**Supporting Document Draft Site Assessment**), which already generates a considerable bottleneck for traffic that brings lengthy queues of traffic along Priests Lane for more than 0.7 miles and leads to obstructions on the A128;

- d. **WILL** have an unacceptable effect on health, the environment and amenity, given the additional pollution that will inevitably accompany the proposed development. Currently, the junction at Wilson's Corner fails to meet EU/UK law on air pollution (**illegal Nitrogen Dioxide levels -BBC website news 1st March 2016**). Since the Priests Lane/Middleton Hall Road junction with the A128 is only 300 metres or so from Wilson's Corner, it is safe to assume that the constant build-up of traffic at Priests Lane/Middleton Hall Road produces further illegal pollution. Consequently, such illegal pollution can only worsen if the Planned Development at sites 044 and 178 goes ahead, and will be further exacerbated by the planned substantial increase in housing planned for Brentwood Town Centre;
- e. **WILL** cause unacceptable effects on adjoining sites with regard to excessive noise, activity and vehicle movements through Bishop Walk, St. Andrews Place and onto Priests Lane. Furthermore 130 dwellings are likely to bring overlooking or visual intrusion and there is a potential loss of privacy;
- f. **WILL NOT** be sympathetic to the current fauna/flora environment, that includes badgers, Muntjac deer, shrews, pheasant, heron, greater spotted and green woodpeckers, wild plum trees, rare trees such as oriental oak and white beam, etc. The field has also developed over the years into a unique wild flower meadow that is worth preserving;
- g. **WILL NOT** be able to mitigate its impact on local services and community infrastructure since the local community will be placed under enormous strain during the years that it will take to complete the development and will have no compensating facilities/services/amenities to counteract the resulting tensions.

In relation to **Policy Statement**

6.16 It is believed that any new development on sites 044 and 178 cannot be sympathetic to the **character and form** of neighbouring properties and surroundings, since the houses in Bishop Walk and St. Andrews Place are, respectively, of a coherent or uniform architectural style and size. Similarly, whilst the houses on Priests Lane are not uniform in style, they are generally uniform in size. All of these properties are detached and incorporate 4-6 bedrooms. It is assumed that the 130 envisaged dwellings planned for Sites 044 and 178 would not be of these characters and forms.

6.22 The proposed sites are adjacent to a major rail artery into London. Consequently, the safety of children and the elimination of anti-social behaviour and vandalism cannot be guaranteed.

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

The only Sustainability Appraisal that has been found is that produced in January 2015. It reviewed a number of sites in detail, but the Priests Lane sites (044 and 178) were not mentioned or identified.

Hence, the following objections to the development of sites 044 and 178 on the grounds of non- sustainability are:

- Sites 044 and 178 occupy an area of 5.35 hectares. LDP documents state a density of 96 dwellings per hectare. This implies that dwellings would occupy 1.35 hectares. If the other 4 hectares are given over to open space, sport and roads, this would only bring more traffic onto Bishop Walk, St. Andrews Place and Priests Lane, which could only exacerbate congestion, pollution, noise and further compromise safety, all of which have been mentioned above.
- Currently the 2012 average number of children per family of 1.7 (1.8 for married couples and those in civil partnerships), means that 130 dwellings could accommodate 221 children of (obviously) varying ages. If we assume a simple even distribution across the 0 - 16 age range, that would produce roughly 14 children for each year of age. That would represent at least one additional class for each school year. Currently the Borough's primary schools are at full capacity (**Sustainability Appraisal 2015**). There appears to be no definite plan for additional school capacity or safe access facilities for schoolchildren in the Priests Lane area.
- If we assume 3.7 occupants in each dwelling (i.e. 2 adults plus 1.7 children – current national average family size), the Ursuline-Priests Lane development will bring a further 481(approximately) residents to the area. Over the past 10 years it has been difficult to obtain places at local GP and dental surgeries. Since there has been no increase in the provision of local surgeries, it is safe to assume that an additional 481 people could not join local practices, yet there is no definite plan to increase the number of available surgeries.
- The Priests Lane sites cannot ensure a satisfactory public transport service for more residents, since there is no bus service running down Priests Lane, which is too narrow to permit such a service in any case.
- Information from current councillors indicates that the drainage and sewage network in the area is running at full capacity and may even be overloaded already (see **Sustainability Appraisal 2015**). Hence, this situation can only be dangerously aggravated by further housing development, and lead to serious public health and safety issues.
- On 1st March 2016 Brentwood experienced morning rainfall for several hours. By 11.00 a.m. Priests Lane and Middleton Hall Lane were suffering surface flooding, emphasising the adverse drainage conditions. Furthermore, it is reported that meetings at the Ursuline School, some years ago, to discuss development of the Ursuline Sisters Playing Fields (site 044) were informed that the site was too wet for development. This can only mean that additional drainage is required in the area, which does not exist.
- The Brentwood Borough Council is well aware that Priests Lane is in a state of general disrepair. Electricity, gas, water and telecommunications repairs are undertaken on a regular basis. Further attempts to add to the capacity of an already vulnerable array of utilities can only result in additional disruption in Priests Lane and hasten the already gradual deterioration of the road surface.

Protected Open Urban Space:

The sites 044 and 178 are currently protected from development. They have been recognized as valuable to the local community since the overall area is one of the few remaining open greenbelt sites within the urban community, helping to separate Shenfield from Brentwood and preventing the establishment of urban sprawl. **Policy 9.1** states that the Council is committed to retaining habitats and 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 prevent the coalescence of settlements. Therefore, retaining this site

as a protected open space correlates with this policy objective. Consequently, it would be contradictory to deprive the community of this greenbelt asset. The Strategic Housing Land Availability Assessment (October 2011) concluded that these greenbelt sites 044 and 178 were unsuitable for development since "the Council's open space audit values the site's contribution to open space provision within the area". It is considered that this conclusion remains apposite. It is not without significance that Eric Pickles, when Minister for Communities and Local Government, committed the government to protecting green spaces as special areas significant to the local community, wildlife habitats and general health, even in the form of local playing fields.

For all of the reasons listed above, I am objecting to the development of Priests Lane sites 044 and 178 as outlined in the Local Development Plan 2016. I believe that since the proposed development does not meet any of the relevant criteria laid down by the Brentwood Borough Council itself, nor does it meet relevant sustainability conditions either, that the proposed Priests Lane sites 044 and 178 should be removed from the list of proposed development sites.

Yours faithfully,

Chloë Sanders.

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