



Brentwood Draft Local Plan 2013 – 2033

Evidence Base

Brentwood Enterprise Park

Representations on behalf of St Modwen Developments Ltd and S & J Padfield and Partners

March 2016

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1.0 Introduction

- 1.1 These representations are prepared on behalf of St Modwen Developments Ltd (SMD) and S & J Padfield and Partners (SJP) to the Brentwood Draft Local Plan consultation March 2016.
- 1.2 Representations on the Draft Local Plan itself have been made under separate cover. This representation provides comment on the following evidence base documents recently released by Brentwood Borough Council:
 - Highway Modelling (February 2016) – Peter Brett Associates
 - Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt – Working Draft (February 2016) – Crestwood Environmental

2. Highway Modelling (February 2016) – Peter Brett Associates

- 2.1 An initial review of the Highway Modelling work by Peter Brett Associates has been undertaken by Atkins on behalf of St Modwen Developments Ltd. We would comment that the work undertaken appears sufficiently sound for Local Plan purposes but further work will be needed prior to publication stage and for application purposes as follows:
- 2.2 Further detailed engagement with Highways England or Essex County Council is required and Atkins would wish to take part in such future discussions where relevant to M25 Junction 29 or the A127.
- 2.3 This future work will need to include further more detailed analysis of key highway junctions including Junction 29.
- 2.4 The PBA work will need to be taken forward to include other developments when committed or other trends.
- 2.5 The OmniTrans model will need to take further account of changes in traffic levels which are likely to influence routing as a minimum, and potentially distribution and mode choice;
- 2.6 Trafficmaster speeds should use median speeds.
- 2.7 Interactions between various developments will need further work, particularly in terms of distribution, where some trips from the new housing developments will travel to the new employment locations
- 2.8 Influence of external developments in other areas
- 2.9 The approach assumes that developments have no impact on the existing traffic, rather that their impacts are additional. In the context of the longer term impacts of the plan as a whole, developments will affect existing traffic behaviour and this will require assessment in the future.

3.0 Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt – Working Draft (February 2016) – Crestwood Environmental

3.1 Liz Lake Associates have been appointed by SMD to advise on landscape and Green Belt matters. Whilst the Crestwood Environmental Green Belt report has only been recently released as a working draft, Liz Lake Associates have undertaken an initial review. The key comments from this are set out below and we would be happy to provide further feedback and explanation through discussions with the Council and Crestwood Environmental should that be considered beneficial.

Section 1

3.2 Section 1.1.7 acknowledges that the SHLAA as far back as 2011 recognised that brownfield land would be developed first, and it confirms the Council anticipated c. 9.9 years of supply on brownfield sites (with only 0.1 years supply on greenfield). Therefore, it should be acknowledged that the baseline position is that brownfield land is the starting point, therefore it is peculiar to say the least, that the study does not assess land in relation to the 5th Green Belt purpose.

3.3 With regards to paragraph 1.5.2, we would consider landscape to be a key environmental consideration which needs to be taken into account in its own right – although there is a degree of linkage, landscape and visual issues are a separate and additional to Green Belt (planning) issues.

3.4 Paragraph 1.5.3 states that “only sites situated within the Green Belt have been considered as part of this study”. However, in this respect, it is thus inconsistent and unduly limiting that the Definition (Table 1) for Purpose 1: Well Contained, has key criteria that is stated as assessing “Within a large built up area”. It would be more appropriate for "Within a large built up area" to be changed to "Within existing settlement boundaries".

Section 2 – Methodology

3.5 Paragraph 2.1.1 sets out no definitive method for assessing the effects that potential development may have on the purposes of the Green Belt and nor does it state exactly which precedent studies were helpful in assembling this methodology.

3.6 Paragraph 2.2.6 states that the emphasis of the brief and scope was to assess the ‘potential effects of developing the Sites on the purposes of the Green Belt’. However, in order to do that we consider it necessary to define the baseline position and establish the existing site/ sites contribution to the 5 purposes of the Green Belt. This is particularly important for the Brentwood Enterprise Park site

because of the extent to which the site has been previously developed, including with concrete hard standing.

- 3.7 Paragraph 2.2.17 states purpose 5 has not been assessed, as “it has already been outlined that development will be directed towards land not contained in the Green Belt in the first instance”. This statement seems misplaced, as purpose 5 is focussed on ‘urban regeneration’ and the recycling of derelict sites or other urban land. This could apply to land both within or outside the Green Belt and has little to do with the designation. It is clearly possible for land that is within the Green Belt to have been developed, i.e. which constitutes brownfield land within the Green Belt. We consider the study should be amended to include consideration of this purpose particularly given that the NPPF acknowledges that development of brownfield land within the Green Belt is not inappropriate where it would not have a greater impact on the openness of the Green Belt (see final bullet of paragraph 89). As noted above, the Brentwood Enterprise Park has been largely previously developed.

Purpose 1: Sprawl

- 3.8 Within paragraph 2.2.19 there is no glossary provided in the study to define the term sprawl or urban sprawl. However, the study states the measure is “the degree to which a Site is already developed and is comprised of buildings”.
- 3.9 In paragraph 2.2.20 we would suggest there is an over reliance on “containment” being the key factor/ measure by virtue of the “presence of strong physical and/ or visual features would act as a logical boundary to use to restrict development....”. However it is not clear if these parameters referred to are the usual permanent features (ie roads/ rail/ watercourses) and therefore it could be understood that a hedgerow (not permanent) is seen as an acceptable containment element in Green Belt terms. However, 2.2.21 states that containment of Sites is by “large built up areas”. This could be a contradiction to the above in 2.2.20, and also appears to rule out Sites in small settlement/ village clusters which are not “large”.
- 3.10 2.2.23 then refers to four (4) criteria
1. which redefines containment differently as to “how well the Site relates to an existing large built up area”.
 2. development type can be “infilling”.
 3. boundary seems to be logical definition
 4. effect on openness – this is defined as “relating to the scale of countryside encroachment”, however this may be perceived as double counting because it the key element of purpose 3.
- 3.11 2.2.24 Criteria for Assessment

- 3.12 The table does not state how many criteria need to be fulfilled to achieve each definition.
- 3.13 It is noted below Table 1 that “NB: Site may be ‘Not Contained’, but if it is Brownfield there may be no countryside encroachment.

Purpose 2: Merging

- 3.14 The report states that ‘distance between towns’ forms the main method of assessing this purpose. Overall the assessment seems logical.

Purpose 3: Safeguarding the Countryside from Encroachment

- 3.15 The report states the primary assessment relates to “the appropriateness of the land use in relation to what would be considered countryside”.
- 3.16 The report states that the NPPF does not define these appropriate land uses, however they are listed at parag. 89, as exceptions to the “construction of new buildings” are:

“A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- buildings for agriculture and forestry;*
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), 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”.*

- 3.17 And, para 90
- “Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:*
- mineral extraction;*
 - engineering operations;*

-local transport infrastructure which can demonstrate a requirement for a Green Belt location;
-the re-use of buildings provided that the buildings are of permanent and substantial construction; and
-development brought forward under a Community Right to Build Order.”

- 3.18 The elements listed in 2.2.37 appear to be locally obtained information, based on local sites, rather than the NPPF defined elements.
- 3.19 The assessment of purpose 3 addresses 3 key criteria at 2.2.38,
1. Land use – whether a site is developed or not/ typical countryside.
2. Land cover – appears to be a part repetition of the land use, simply defining which elements of development or otherwise exist.
3. Access- relates strangely to public access – this could weigh heavily against a site where actually public access is a key feature of it’s sustainability and in other terms, something to be welcomed – here it is seen as a negative. Indeed the NPPF states that local planning authorities should look for opportunities to provide access to the Green Belt (see paragraph 81).
- 3.20 We consider the assessment of purpose 3 misses the point of the purpose which is to assess / or appraise the degree of openness of a site and the potential for loss of openness, both in visual terms and physical terms. Rather than focusing on openness, the assessment is focussed on a change in character.
- 3.21 At 2.2.40 The Definition Table 3 refers again to 3 definitions where it is clear that the assessment is focussed on appropriate or inappropriate land use. No or limited public access should not be a negative criteria for the reasons given above.

Purpose 4: Preserve the setting and character of Historic Towns

- 3.22 Overall the assessment seems logical.

Purpose 5: Regeneration

- 3.23 This purpose is not assessed however we consider this should be included within the study as this would properly consider the benefits of previously developed or redundant land that presents an opportunity for enhancement as defined by NPPF 89. We believe that this should be recognised.

Summary Tables

- 3.24 In 2013 it appears the Site was assessed as being of Low -Moderate overall contribution to Green Belt purposes.

- 3.25 In 2015 it appears the Site was assessed as being of Moderate overall contribution to Green Belt purposes.
- 3.26 The difference is the score of Purpose 3 – Safeguarding the Countryside from Encroachment
- 3.27 Whereas (in 2015, as part of an extension to the Site) the site scored medium “Mixed Functions within Countryside (MFC)”, whereas previously (2013) the site scored “Limited Countryside Functions (LCF)”, which is “where the majority of the existing land use is considered an inappropriate land use”.
- 3.28 A further assessment of the Brentwood Enterprise Park site in relation to the Green Belt criteria will follow, but by way of initial example commentary we consider the site should be reclassified for the following "purposes" in the assessment undertaken:
- Purpose 1 – This should be reclassified from 'Not Contained' to either 'Partially Contained' or 'Well Contained'. The site is bounded by the M25 to the west and the A127 to the north. The study acknowledges that boundaries of this nature are "strong". In addition part of the site is previously developed (i.e. brownfield) and as such this limits the degree to which the countryside would be encroached upon.
 - Purpose 3 — This should be reclassified from 'Mixed Functions within Countryside' to 'Limited Countryside Functions'. As noted above, part of the site is previously developed and as such does not contribute to the functional countryside. As we have pointed out above, the classification of 'LCF' was acknowledged in 2013.