

BY EMAIL

Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

Our ref: 22230/A5/JK/SM

22 March 2016

Dear Sir or Madam,

DRAFT LOCAL PLAN (2013 – 2033) FOR BRENTWOOD BOROUGH COUNCIL (FEBRUARY 2016) CONSULTATION

These representations have been prepared on behalf of Columbia Threadneedle and set out comments in response to the Draft Local Plan for Brentwood Borough Council (BBC) February 2016. They follow earlier representations submitted to previous stages of the emerging Local Plan and its supporting evidence base, where we promoted the West Horndon Industrial Estate for residential-led purposes on behalf of our client.

As BBC is aware, Columbia Threadneedle have a controlling land interest in part of the West Horndon Industrial Estate, which is allocated in the draft Local Plan for 'housing led mixed use development'. Site allocation ref: 020 (which Columbia Threadneedle control), along with 021, and 152 are considered appropriate previously developed land for focused growth at West Horndon and are earmarked to deliver a housing yield of approximately 500 dwellings in total, with a mix of supporting local services (including local retail).

We support BBC's inclusion of West Horndon Industrial Estate for residential-led mixed use redevelopment, particularly site allocation ref: 020. It is considered that the reuse of previously development land is consistent with national planning policy guidance and should be encouraged to assist BBC in meeting its significant housing needs. Paragraph 17 of the NPPF sets out the core land-use planning principles that should underpin both plan-making and decision-taking. Point 8 listed under paragraph 17 seeks to "*encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value*".

West Horndon village is a highly accessible and sustainable location. It benefits from local village services, public transport links (including a train station) and quick access to the A127. In these terms, it is considered that the proposed density of 29DPH for the West Horndon site allocations (as set out in Appendix 2 of the Local Plan) is too low and consideration should be given to increasing the density to the region of 50 to 60DPH. To artificially restrict the density of the site allocation would not be consistent with national policy to significantly boost housing supply or to make the most effective use of previously developed land.

With respect to affordable housing (policy 7.5), the minimum requirement should be removed in lieu of a viability led approach to ensure the requirement for affordable housing is balanced and the delivery of development sites is not stalled, in line with paragraph 173 of the NPPF.

To conclude, we therefore support the BBC's allocation of our client's land holding for residential led mixed use redevelopment and subject to the minor comments set out above, consider that the draft Local Plan is positively prepared, justified, effective and consistent with national policy, and is therefore sound.

We would be grateful if the above representations could be taken into account when considering the next stages of the Local Plan preparation process. Confirmation of receipt would be appreciated.

Yours faithfully,



JUSTIN KENWORTHY
Director

CC: Columbia Threadneedle