

Brentwood Borough Draft Local Plan Consultation

**Representations on Behalf of Sammi Developments Ltd
in Relation to Brook Street/Nags Head Lane, Brentwood**

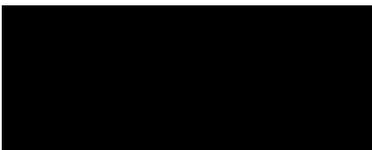
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Summary

The following response to the current draft Local Plan 2013-2033 consultation follows our representations in October 2013 to the then Preferred Options consultation and the Local Plan Strategic Growth Options consultation in 2015. These representations have been made on behalf of our clients, Sammi Developments Ltd, who have an interest in land at Brook Street/Nags Head Lane as identified on the plan attached as appendix 1. Representations have been made previously in relation to this site by One Property Group. It is proposed that this site could provide mixed-use, predominantly office-led high-density commercial, development with an element of residential development on the eastern side of the site.

In summary our representations cover the following key points:

- Over-reliance on less sustainable sites on the A127;
- Concerns over delivery, both within the Plan period and in terms of five year housing land supply; and
- Plan should include the site at Brook Street/Nags Head Lane, Brentwood for an office-led, mixed-use development.

The following response will be set out within this context, and following the headings within the consultation document.

Representations to the Draft Local Plan by Policy

Policy 5.1 Spatial Strategy

The Council's strategy focuses development on the transport corridors. The policy states that the main focus of development will be in and around Brentwood and Shenfield, supported by two strategic allocations in the A127 corridor. It is submitted, however that the Plan overly relies on its allocations in the A127 corridor, which are not the most sustainable locations for growth, given that transport links, access to jobs and services and town centre facilities are more limited. Brentwood and Shenfield are sequentially preferable locations, with better access to services and facilities than the proposed Dunton Hills Garden Village and West Horndon. It is therefore considered that the Council should recognise this in the policy and examine whether there are any additional sites in the Brentwood/Shenfield area that could be brought forward.

Our client's land to the west of Nags Head Lane (site reference 175B) is an appropriate site for commercial-led mixed-use development and would complement the proposed allocation to the east of Nags Head Lane (site reference 032). With regard to the criteria listed under policy 5.1, our client's site has the following merits:

- a) The site has good access to public transport, services and facilities, with Brentwood Urban Area classified as a main town (settlement category 1). It is close to the centre of Brentwood, with bus route 498 providing direct and frequent access to the town centre, which contains a good range of services and facilities. The site is recognised within the Council's Interim Sustainability Appraisal (SA) as falling within 110m from a bus stop.
- b) The site will not have a significant impact on the listed criteria:
 - Green Belt – although the site falls within the Green Belt, its development is considered to be appropriate, in the context of the purposes of the Green Belt, for the reasons summarised below:
 - Purpose 1: The site is contained by commercial buildings to the north, the railway to the south, the M25 to the west and an allocated development site to the east.
 - Purpose 2: The M25 is a significant barrier between Brentwood and Romford and both the M25 and the railway lines are permanent physical barriers that cannot be breached.
 - Purpose 3: Whilst it is accepted that the site is functional countryside, it has no public access and has no greater value in this regard than the land to the east which has been allocated for development.
 - Purpose 4: The site has a limited relationship with the historic town, as identified by the Council's GB Assessment.
 - Visual Amenity – the site is relatively well contained, with limited views from the main frontage to Brook Street, due to the substantial landscape screening bounding the site. Again views are limited from the east and the south as the site is bounded by Nags Head Lane to the east and the railway to the south. The Council's Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt – Working Draft Document (GB Assessment) 2016 recognises that the landscape quality of the site is relatively low.
 - Heritage – there are no heritage assets on the representation site. The nearest listed building is the Grade II Nags Head Public House, which lies on the corner of Brook Street and Nags Head Lane. Any development would have regard to this building and its setting and would be set back some distance from this building, with appropriate screening (as shown on the illustrative layout – Appendix 1). The

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- Council's GB Assessment recognises that the site has little or no relationship to the historic town in terms of heritage assets.
- Transport – The site is well served by public transport, given its location fronting onto the A1023, which leads into the town centre. Brentwood and Shenfield both benefit from train stations. The site lies on the south side of Brook Street (A1023), providing easy access into the town centre. It is also in close proximity to junction 28 of the M25, providing easy access to both the M25 and the A12.
 - Environmental Quality – this site is recognised as having a relatively low landscape quality in the Council's GB Assessment.
 - Wildlife – there are no known wildlife constraints in relation to this site. As identified in the SA there are no SSSIs within 2km of the site. Ecology surveys will be undertaken in due course.
 - Flood Risk – the site lies within Flood Zone 1 and is not therefore at risk from flooding.
 - Air and Water Pollution – the site is located in close proximity to an Air Quality Management Area, to the west of the site. It is proposed that any application for development on this site would be accompanied by an Air Quality Assessment and mitigation would be provided as appropriate. The scheme proposed provides less sensitive commercial development, with residential development on the eastern side of the site.
- c) Our clients are committed to the delivery of this site and can confirm that this site is deliverable within the early part of the plan period.

The development of this site would represent a logical extension to Brentwood, particularly given the proposed residential allocation to the east and the existing development to the south of Brook Street. The representation site could be brought forward in conjunction with the adjoining proposed allocation and there is flexibility with regard to the layout and mix of uses on the representation site.

In light of the above, it is considered that although allocation of our client's site would necessitate Green Belt release, the site is well located for development and the impacts would be limited.

Policy 5.2 Housing Growth

Provision of new dwellings in accordance with Objectively Assessed Housing Needs (OAHN) is supported. However, concern is raised in relation to the reliance on Dunton Hills Garden Village to provide 2,500 dwellings within Plan period, equating to 35% of housing for the Borough. The Plan has heavy reliance on this one site which has no existing services and facilities and in our experience, delivery of such settlements, which not only provide new housing and employment, but supporting infrastructure, services and facilities are slow to deliver. It is also relevant to note that although a development of this type will bring forward some facilities and services, these are likely to be limited in nature and scale due to the limited size of the future population. It is submitted that this site should either be excluded from the Plan or reliance on the delivery of this site should be reduced and other sites should be allocated adjoining the urban areas of Brentwood/Shenfield.

Reliance on this large site, which will have significant infrastructure requirements, impacts on the delivery a five year supply of housing, which is a requirement of the NPPF under paragraph 47. The Council's housing trajectory at figure 5.11 clearly shows that the Council does not have a five year supply of housing and that undersupply in years one to three will not be off-set by supplying over the minimum requirement in years 4 and 5. The Council clearly needs to allocate additional sites at this stage to ensure that the five year requirement can be met.

Housing completions have been low in recent years, with only 105 dwellings completed in 2013 and 159 in 2014. Not only will the Council need to make a step-change in terms of delivering housing, it is submitted that the Council should take account of previous under-delivery in identifying sufficient sites to meet housing requirements and also a 20% buffer in accordance with the NPPF.

The SHMA (2013) identifies Brentwood as largely a single housing market area, whilst recognising that to some extent it shares its housing market area with Basildon and Chelmsford. It is considered that the significant housing allocations at Dunton Hill Garden Village and West Horndon will contribute to the Basildon's housing market area to a greater extent than the Brentwood housing market area due to the location of these sites relative to the main urban areas. Sites on the edge of Brentwood and Shenfield can make a greater contribution towards meeting local need for housing within the Brentwood housing market area.

In order to reduce reliance on the allocation at Dunton Hills Garden Village, for the reasons outlined above, and to ensure that the Council has a five year supply of housing, it is suggested that appropriate, additional sites on the periphery of the principal urban area of Brentwood and Shenfield should be allocated. In accordance with our representations to Policy 5.1 our clients land at Brook Street/Nags Head Lane should be allocated accordingly.

Policy 5.3 Job Growth and Employment Land

This policy identifies that sufficient land will be allocated to make provision for 5,000 additional jobs over the Plan period at an average annual rate of 250. It is submitted that the total number of additional jobs is a conservative figure that should actually be increased. The Economic Futures Report (2014) recognises the need to address the imbalance between people living and working in borough and the high proportion of out-commuting to London. The report provides three scenarios which identify job growth of between 5,750 and 7,440.

The representation site should be included as a mixed-use, office-led high-density development.

In order to include our clients land as a new employment land allocation, amendment should be made to include the site in Figure 8.3 and on the Key Diagram.

Policy 6.5: Key Gateways

This policy, which recognises the important role gateways providing an opportunity to provide a positive impression of the Borough, is supported. The Brook Street Roundabout (M25/A12/A1023 interchange) is recognised as being a key gateway and the representation site can make a positive contribution towards enhancement of this gateway. It is a suitable size for large Head Quarter Operations and users that require a large footprint of building, which cannot typically be accommodated within town centres, due to the more limited size of available sites.

Policy 6.6: Strategic Sites

The changes to the Plan since the Preferred Options stage to remove West Horndon as a Strategic Allocation is supported, as identified, the impacts on the existing village would be significant and would not be in accordance with the emerging spatial strategy.

For the reasons set out in our representations to Policy 7.1, reliance on the housing-led strategic site of Dunton Hills Garden Village in the Plan period should be reduced.

Policy 7.1: Dunton Hills Garden Village

As set out in our representation to Policy 5.2, concern is raised in relation to the reliance on Dunton Hills Garden Village to provide 2,500 dwellings within Plan period, equating to 35% of housing for the Borough. The Plan has heavy reliance on this one site which has no existing services and facilities and in our experience, delivery of such settlements, which not only provide new housing and employment, but supporting infrastructure, services and facilities are slow to deliver. It is also relevant to note that although a development of this type will bring forward some facilities and services, these are likely to be limited in nature and scale due to the limited size of the planned population. A new settlement of 2,500 houses will never provide the level of services and facilities as larger settlement such as the principal urban areas of Brentwood/Shenfield and are therefore less sustainable locations for new development. It is submitted that this site should either be excluded from the Plan or reliance on the delivery of this site within the Plan period should be reduced and other sites should be allocated adjoining the urban areas of Brentwood/Shenfield.

The Sustainability Appraisal identifies the potential for significant negative effects arising from the draft Plan “given the uncertainty that remains regarding Dunton Hills Garden Village. One of the most effects is in terms of landscape:

“With regards to Dunton Hills Garden Village, there are clearly landscape sensitivities, with consultees (notably Thurrock Council) suggesting the potential for impacts to valued landscapes, and loss of Green Belt that serves a clear purpose (particularly in the sense of preventing coalescence and/or sprawl). It is anticipated that there will be good potential to avoid/mitigate effects; however, there is some uncertainty and a need for further work to examine options. It is noted that, whilst there is the potential to make use of some clearly defined physical features (A127, A128, railway line), it may be a challenge to ensure a defensible long term boundary separating the Garden Village from west Basildon (where there is a planned urban extension).

With regards to the A12 urban extensions, there are perhaps fewer concerns.” (Paragraphs 18.1.13 to 18.1.14).

Flooding is also identified as a notable issue:

“... would need to address flood risk issues, given the stream that runs through the site (which notably leads to an area to the south of the site, adjacent to the railway, as being ‘more’ susceptible to flooding, according to SWMP modelling). ... Also, it is noted that a large portion of the area ... is identified by the SWMP as having limited potential to deliver ‘infiltration’ measures as part of sustainable drainage strategy.” (Paragraph 16.1.2).

Policy 7.4: Housing Land Allocations

The inclusion of Dunton Hills Garden Village for 2,500 dwellings within the Plan period is questioned for the reasons set out in our representations to Policy 7.1.

It is submitted that the representation site at Brook Street/Nags Head Lane can make a modest contribution towards housing supply as part of an office-led mixed use scheme. The illustrative layout shows in the region of 35 dwellings covering around one-sixth of the site. The exact quantum of residential development could be tailored to meet the Council’s requirements.

The representation site has multiple benefits, as identified in our response to Policy 5.1.

Policy 8.1: Strong and Competitive Economy

This policy which seeks to maintain high and stable levels of local economic growth is supported.

Policy 8.2: Brentwood Enterprise Park

The allocation of Brentwood Enterprise Park comprises the former M25 works site and land at Codham Hall.

Although the M25 works site is well located in terms of access to the highway network, it is poorly located in terms of access by non-car modes. Also it is neither located within close proximity to facilities or services nor is it located near residential development and therefore employees working at this site will make all trips by car. The nearest stations are Brentwood (3.6miles) and West Horndon (4.7 miles) and there is no bus route to either station. As a consequence it will only be attractive to a very limited number of low employment density transport related uses.

Whilst it is noted that this site is covered by substantial amounts of hardstanding, it is queried as to why it is now being allocated as the previous use as a works site for the M25 improvements was a temporary use which, once ceased, should be returned to its former use in accordance with the Permitted Development agreement. The principle of the allocation of this site is questioned, as is the extent of land identified. It is likely that development would be visible from the surrounding area, changing the character of the area, not only covering a far greater area than the former works site, but also having a far greater impact.

The Codham Hall Lane is an existing, isolated employment site with a number of existing permitted industrial type uses within agricultural buildings. Again, this site is poorly located in terms of access by non-car modes and employees will make trips by car. As such similar considerations therefore apply in terms of accessibility and range of potential uses. Given the presence of existing uses, this site is likely to be slow to come forward as these uses will need to relocate in advance of redevelopment.

These two sites are the two largest employment allocations, with site areas of 23.41ha and 6.64ha respectively. These sites are not well located in terms of the principal urban area of Brentwood and Shenfield and therefore have limited accessibility by non-car modes. We consider that a development strategy which focuses development in and around the primary urban areas is more sustainable and provides greater opportunities for reduced trip lengths and accessibility by non-car modes. This approach would accord with the Core Principles of National Planning Policy Framework (NPPF), which state that planning authorities should “proactively drive and support sustainable economic development” and “make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are on can be made sustainable”.

The representation site is considered to be preferably located as it has a higher level of public transport accessibility and also is located in close proximity to existing and proposed dwellings, and can therefore provide opportunities for employees to walk and cycle to work.

Policy 8.3: Employment Development Criteria

The criteria set out in this Policy are supported.

The illustrative plan for the representation site complies with these criteria and the site is particularly well located in terms of the main arterial routes of the A12 and the M25. The representation site is more accessible by public transport, walking and cycling than the draft allocations at Brentwood Enterprise Centre to the south of the Borough.

Figure 8.3: Employment Land Allocations

This should be amended to include reference to representation site at Brook Street/Nags Head Lane.

Figure 9.2 Green Belt in Brentwood Borough

This should be amended to include reference to representation site at Brook Street/Nags Head Lane.

Policy 9.12 Site Allocations in the Green Belt

This should be amended to include reference to representation site at Brook Street/Nags Head Lane, which is deliverable early in the plan period, unconstrained, adjoins Brentwood urban area and can provide a mixed-use development.

Appendix 1

Plans of Brook Street/Nags Head Lane site



Phase 2

PLANNING &
DEVELOPMENT
LIMITED