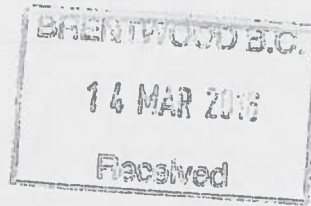


Respondent 210
Agent 4545

President:
Lord Lieutenant of Essex
Chairman:
Chris Butler
Vice Chairman:
Richard Beauchamp

RCCE House
Threshelfords Park 1/7
Inworth Road, Feering
Colchester CO5 9SE
tel/fax: 01376 572023
e-mail: office@cpressex.org.uk

to:
Head of Planning Services
Brentwood Borough Council
Development Control Dept.
Town Hall, Ingrave Road
Brentwood CM15 8AY



Please reply to :
Robert Flunder

10th March 2016

Dear Sir/Madam,

Brentwood Draft Local Plan (2013-2033) - CPRE Brentwood Branch Response

Introduction

This submission has been prepared by the Chair of the Brentwood Branch of CPRE (Campaign for the Protection of Rural England) Robert Flunder, and branch members.

Our Brentwood CPRE group are, as a matter of principle, opposed to the proposal for the building of 2500+ homes in the green belt and hold the current and previous governments policies responsible for this alleged need, because of planning policies subordinating green belt to housing and economic considerations, and the absence of any effective population growth rate reduction policies, this being the prime driving factor in the need for increased homes building. We accept Brentwood Council have no choice in the matter.

M25 Junction 29 Employment Cluster.

In the main document page 50 fig 5.12 and in the Pattern Book Map on page 42 this group of employment sites is shown within the figure of an oval, giving the impression all land within forms part of the "M25 Junction 29 Employment Cluster".

We request therefore the diagrams be re-drawn with the phrase "M25 Junction 29 Employment cluster" in one corner of the diagram, and arrows emanating from this pointing to each individual employment site.

Even worse in the main document page 40 fig 5.9 and in the Pattern Book page 41 the "oval" is labelled -"M25 Junction 29 Employment Zone" giving the impression all the homes and rural land in the area fall within the 'employment zone'.

We think it appalling that such concepts as "Junction 29 Employment Zone" covering a very large area of southern Great Warley and southern Little Warley could be presented as a proposal in this way without any reference in the text of the Draft Local Plan.

The Draft LDP, with these features, has now been distributed widely, promoting this concept throughout the borough to planning professionals, developers, and other interested parties.

Discussion with the Brentwood Council Senior Planning Policy Officer revealed the promotion of these concepts to be unintentional and this area within the oval is not being designated as an "Employment Zone" and therefore this diagram and label are dangerously in error.

CPRE emphatically request an addendum be issued to this Draft LDP removing the phrase "J29 Employment Zone" and the 'oval' diagram from all documents to prevent any misunderstanding, to prevent any planning blight or adverse impact on the value of homes within the depicted area, and to prevent the possibility that this feature can in future years be claimed to be a policy.

We understand that as a member of the LDP Working Party, Warley Cllr Jill Hubbard had requested the Head of Planning Policy remove these very features, and had understood that this would be done before publication of the Draft LDP.

The final Local Development Plan should not have these features.

Choosing where Green Belt development should occur.

It is CPRE policy that no green belt land should be built upon.

However in Brentwood's case, where non green belt land comprises of only 11% of the total land area, such building is obviously going to happen, and so it is necessary to express an opinion on how the Council has selected particular green belt sites for development, since not all green belt candidate sites are the same.

The Draft LDP recommendation that Dunton Hills Garden Village be identified as a suitable major site for housing development flows from the Spatial Strategy decision to base development on a combination of Spatial Strategy Options 1 and 2, in preference to Options 3 and 4.

Our group agree with this strategy, accepting the Council's reasoning that a choice of Options 3 or 4 would lead to an even greater reliance on green belt/greenfield sites, detract from the rural character of the borough, and increase car dependency.

In addition it would be highly undesirable to develop on the most scenic, high landscape value, green belt sites.

If building in the green belt is inevitable, then developments should be in sustainable locations with good existing transport links, schools, healthcare facilities, and infrastructure.

The Draft LDP proposes, Dunton Hills Garden Village, a choice we agree with in principle. Transport links, local shops, employment land, community facilities, schools, and healthcare facilities are all promised, but the size of the requirement is not quantified, nor is there an unequivocal statement that no house building permissions will be given without a requirement developers make an appropriate contribution to this infrastructure.

A Masterplan is promised is for Dunton Garden Village, however without this CPRE cannot give its unequivocal support to the proposal.

We also agree with the principle to develop existing industrial sites in West Horndon.

With a commuter line rail station, good access to the A127 (and thence to the M25 and national highways network), we believe West Horndon has far better transport capacity than any other potential candidate development site.

However a Masterplan should be produced for the considerably expanded West Horndon village and without this CPRE cannot give its unequivocal support to the West Horndon Industrial Sites proposals.

Large scale candidate sites such as Dunton Hills Garden Village and West Horndon Industrial Sites demand the requirement of attracting housing developer funded/provided infrastructure and planning permissions should not be granted without these.

To minimise the disruption to West Horndon residents of the proposed large scale development, it should be a Local Plan requirement all construction and developers traffic will be banned from using Station Road and Thorndon Avenue, and that all construction traffic can only access the sites via Childerditch Lane or the A127.

We also believe the Local Development Plan should require the following home qualities :-

Adequate off-road parking but with limitations placed on domestic hard surfacing

Mandatory landscaping/trees

Acknowledged good quality designs

Good sound and thermal insulation

Good room sizes

Allocations to Dunton Hills Garden Village and West Horndon Industrial Zones.

We believe that this Draft LDP is only partially utilising the considerable land available within or immediately adjacent these areas, and that a large number of additional homes could be built at these sites.

We believe a larger number of homes than in the Draft LDP should be allocated at these sites.

We believe this would ease development pressures in central Brentwood, and in particular at the following sites which we do not believe should be developed :-

(a) Honeypot Lane.

We are strongly opposed to the development of this Green Belt land at this location which would be very harmful to the high value landscape character of the area. The 250 homes allocated could easily be accommodated within the Dunton Hills Garden Village and West Horndon Industrial sites localities.

An area of high quality landscape Green Belt land as this site, close in to central Brentwood, is of enormous environmental value

(b) Chatham Way/Crown Street Car Park

We believe the retention of this car park is essential as Brentwood grows, and that in any event the area forms a part of the diminishing attractive character of central Brentwood, something that will diminish further if every piece of available land is developed.

Brentwood Enterprise Park

One major issue is that of junction 29 of the M25 which lies entirely within green belt area, the London boundary aligned with the M25, the western side within the London Borough of Havering and the eastern side entirely within Brentwood.

Over the years Brentwood Council have allowed their two 'quadrants' to be degraded by creeping industrialisation both north and south of the A127 immediately east of the M25, on land owned by Codham Hall Farm.

We believe it should be a requirement that as a condition of the proposed development going forward, a scheme of permanently evergreen screening tree species and landscaping will need to accompany this.

Since the primary purpose would be 'screening' and not 'nature conservation', native tree species would not be mandated and the species should be selected solely on their 'screening qualities'.

Brentwood Town Centre Policy

It has been suggested that there is an intention to remove the small garden/green open space (approx. 30 metres by 15 metres) by the Chapel Ruins.

We believe the ensuing all paved area would exacerbate the potential 'urban hardness' of the town centre, particularly as it proposed to site so many extra homes at high building densities in this locality as a consequence of choosing Spatial Strategy Option 1 as one of the main spatial strategy options.

It is the intention to convert the public space around the Chapel Ruins into a 'public square or piazza' ignoring the fact that the area is already a well used central public space where day time public gatherings take place.

The Chapel Ruin Garden is ***not an 'impediment'*** to improved pedestrian links between William Hunter Way and the Baytree Centre.

The existing two walkway entrances to the Baytree Centre from the High Road are both about 5 metres wide and merge about 30 metres southwards from the High Road into a single large 'mall type' walkway of about 15 metres width (*larger than the approx. 10 metre full width of the actual Baytree building entrance doors which are situated just about another 35 metres southward.*)

We believe there is just no justification for believing the Chapel Ruins Garden are an impediment and problem in this way, and we believe the Council undermines its own case by NOT proposing to remove any shop buildings on the north side of the High Street opposite the Chapel Ruins and garden, when simple inspection will demonstrate that these clearly are an actual physical impediment to improved pedestrian links between William Hunter Way and the Baytree Centre.

We believe the Council case also depends on regarding the Chapel Ruins garden as "little used". We believe this fundamentally misrepresents the case, as the Council removed seats previously provided – what are people to do, simply stand stationery in the area to qualify as "users" ?

The garden provides a visual area of green tranquility, measuring approx. 30 metres by 15 metres which directly falls upon the eyes of all passers-by, and which performs an important 'reassuring and calming' function for those using the area for shopping.

As such, far from being 'little used' it is used by, and benefits, hundreds of passers-by every day.

It would be very easy to restore some public seating in this garden and thus re-establish a second type of use as a pleasing, green, town centre seating location- somewhere to take a break.

We request the seating is restored in the Chapel Ruins Garden and promised in the LDP.

We also believe the Council vision of expanding this Chapel Ruins area into a full public square carries with it the potential for late night public gatherings with the potential for disturbance to surrounding properties and residents, and this is a relevant factor when the Council are proposing to locate some many extra homes in Brentwood town centre, of which 200 are proposed at the Baytree Centre alone

The Council's euphemistic phrase 'Nighttime Economy' presages more alcohol outlets. While central Brentwood needs a number of pubs and bars it already has them.

More alcohol outlets will attract more weekend night non Brentwood visitors, adversely impacting the character of central Brentwood and the quality of life of those that live there. Fine for bar owners, but not for residents.

We believe the Draft LDP 'town square' policy and the Council policy of locating another 200 homes in the Baytree Centre and many others in the town centre of Brentwood generally, are in direct conflict with each other, threatening the quality of life of those hundreds of additional town centre residents and existing residents.

We believe Brentwood Town Centre Policy 8.6 para (e) "*.....evidence of responsible management and stewardship arrangements...*" and "*.... to ensure no disturbance to surrounding properties...*" is no more than a textual response to our earlier representation, not a robust enforceable planning policy; however it does highlight what problems will certainly occur, and we re-iterate our view that the two policies of maximising the number of dwellings in the centre of Brentwood, and developing the 'Town Square' as a "vibrant" gathering place for the "nighttime economy" are in direct conflict with one another.

The Draft LDP 'Vision' regarding the centre of Brentwood seems like one of making the Essex town of Brentwood more like the London town of Romford.

Baytree Centre

The Site Allocations Map book page 20 shows the proposed development stretches far beyond the curtilage of the Baytree Centre.

We do not agree that the following areas on page 20 should be redeveloped as part of the Baytree Centre, since they are not part of the Centre in any event, and they make a huge contribution to the character of central Brentwood : _

- a) Shops on the east side of Crown Street.
- b) All houses and properties in South Street, except the former Coop supermarket on the east.
- c) The actual carriageway in South Street.

General Development Criteria

As our organisation stated in 2013 we believe this policy should be modified to show that in addition, actual compensation should be paid to immediate neighbours who experience a loss of amenity or actual home value reduction, in the event the Council grant planning permission in these circumstances.

Landscape Protection and Residential Densities in the Green Belt

Regarding residential densities in Rural & Semi Rural Greenbelt Areas (other than very large scale sites like Dunton Hills) we believe these should be low densities. Brentwood has a very high proportion of green belt land.

Current government policies lead to the view that with each succeeding LDP period, Brentwood Council will feel it necessary to allocate more and more new housing development in the green belt.

In view of the fact that with this Draft LDP (2013-2033) Brentwood Council are obliged to have a significant 'green belt take', it is not inappropriate to assume that this process will be repeated in the future with each succeeding Brentwood LDP.

It therefore becomes entirely appropriate to have quantified 'Building Density Considerations' in place for development in areas of high landscape value.

What must be avoided is the,perverse view of the Council, that when a green belt site is promoted for development (a 'green belt sacrifice'), that the site be developed at a considerable housing density on a - 'pack 'em in' - philosophy, or what the Council refers to as 'efficient use of land', in an attempt to save further 'green belt sacrifice'.

An example is the Mascalls Hospital site in Great Warley where the Council required high building densities.

Given that Brentwood has so much green belt land (89% of the borough) we do not consider this is a proper basis for development land allocation.

We believe, given that Brentwood land area is composed of 89% green belt, that it is environmentally preferable to sacrifice some additional green belt and build green belt developments of adequate size and modest densities, than to have a policy of sacrificing the very minimum and building to high densities. We believe this current policy will lead to pockets of "mini-urbanisation" in the countryside, harm the visual amenity of green belt areas, as well as adversely impacting the quality of life of those who will live in these homes, since there will be pressure to build them very small.

We believe the existing Council policy of "efficient land use" will lead to small properties in rural/semi-rural housing clusters of extreme building density, and this policy should be reversed.

CPRE believe an explicit policy should state that where the surrounding greenbelt area has high landscape value or rural/semi-rural characteristics, e.g. in or near a former Special Landscape Areas as previously designated in earlier Local Plans, then residential densities should not exceed 20 dwellings per hectare and could be significantly lower depending on the location.

This should also apply to any affordable homes built in greenbelt areas of high landscape value, and should form one of the components of Council policy of developing rural/semi-rural homes in keeping, and respecting, the green character of the area in which they are developed.

We believe this should be stated explicitly and prominently within the main Draft LDP.

This is already an alternative Council policy as shown in Brentwood LDP (2015-30) Preferred Options-Supporting Document-Draft Site Assessment.

Certain large sites in areas of great openness and high landscape value, even though not finally being allocated for housing on this occasion, were, notwithstanding greenbelt policy, assessed for development at an assigned indicative density of 20 dwellings per hectare.

These were in former Special Landscape Areas, and although such designations have been removed as a matter of government policy, the open character and high landscape value of these areas remain.

Such development at landscape sensitive sites should be in keeping with the surroundings with low densities and sympathetic designs.

CPRE believe there should be no house building in former Special Landscape Areas or other areas of great character and/or high scenic quality, but if Brentwood Council felt compelled to approve such development, then this existing alternative Council policy should be prominently in place requiring very low building densities indeed on such sites, as a 'Policy Led' attempt to mitigate the potential harm of development.

While noting the mention of the 'Living Landscapes' work CPRE believes that the concept of 'Landscape Character' is of equal importance and the previous Special Landscape Areas in southern rural Warley and in rural Hutton south of Church Lane and Hall Green Road warrant mention no less than those sites nominated by Essex Wildlife, although we believe Essex Wildlife Trust's primary interest is 'Wildlife' rather than 'Landscape Character'.

Woodland Management

We support the policy presumption in favour of native species where the object of tree planting is for conservation purposes, but where the primary objective of tree planting is screening of industrial/commercial/ and housing sites then we do not agree at all with this policy.

In these circumstances we believe the policy should state evergreen species of whatever origin can be planted to maximise screening.

A 'native species only' policy has been applied comprehensively and inappropriately in the past in situations where 'screening' has been the requirement, and the screening has disappeared as each winter approaches and the leaves fall.

Given the huge amount of native species forested land that Brentwood has we do not believe such a policy would be detrimental to wildlife/insects in any way.

Green/Sustainable Transport Links

(a)

We believe more public transport through Ingrave and Herongate is likely to slow traffic and even cause hold ups, with the consequential increase in pollution that arises from stationary vehicles, or those in a low gear.

(b)

A pedestrian bridge needs to be provided to cross the A127 in the vicinity of Thorndon Park. It would be irresponsible of Brentwood Council to take the view that pedestrians can cross the A127 on foot; pedestrian deaths have occurred crossing the A127.

Green Belt Dwellings for Agricultural/Horticultural/Forestry Workers

We believe 'Business Viability' should be publicly demonstrated in planning applications for new homes under this provision.

A Business Plan should be submitted to the Council as a part of the planning application, and be available for public scrutiny.

The LDP should state explicitly that such a Business Plan, as part of the planning application, cannot be withheld from public scrutiny for any reason, including 'business confidentiality'.

The viability of the Business Plan should be validated by the Council, and demonstrated publicly in a Planning Officer's Report before the Council can give Approval to such planning applications. It should also be made explicit that Business Plan non-viability is a valid objection reason in the public consultation of such applications, thus reinforcing the need for public access to the Business Plan.

When a dwelling with an agricultural worker's condition attached is built owners should not be able to apply for the condition to be removed for 10 years.

Rural Land North of Hatch Road, Pilgrims Hatch

Although this is not an allocated area, if this area, including ancient woodland, were ever considered for development we believe this would be wrong.

There are strong environmental and heritage reasons why this land should not be developed for housing.