

THE BRENTWOOD DRAFT LOCAL PLAN PREFERRED SITE ALLOCATIONS

DRAFT SITE ALLOCATION AT HONEYPOT LANE (REF 022)

OBJECTIONS ON BEHALF OF THE HONEYPOT ACTION GROUP

OUR Ref – 1029

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1.0 Introduction

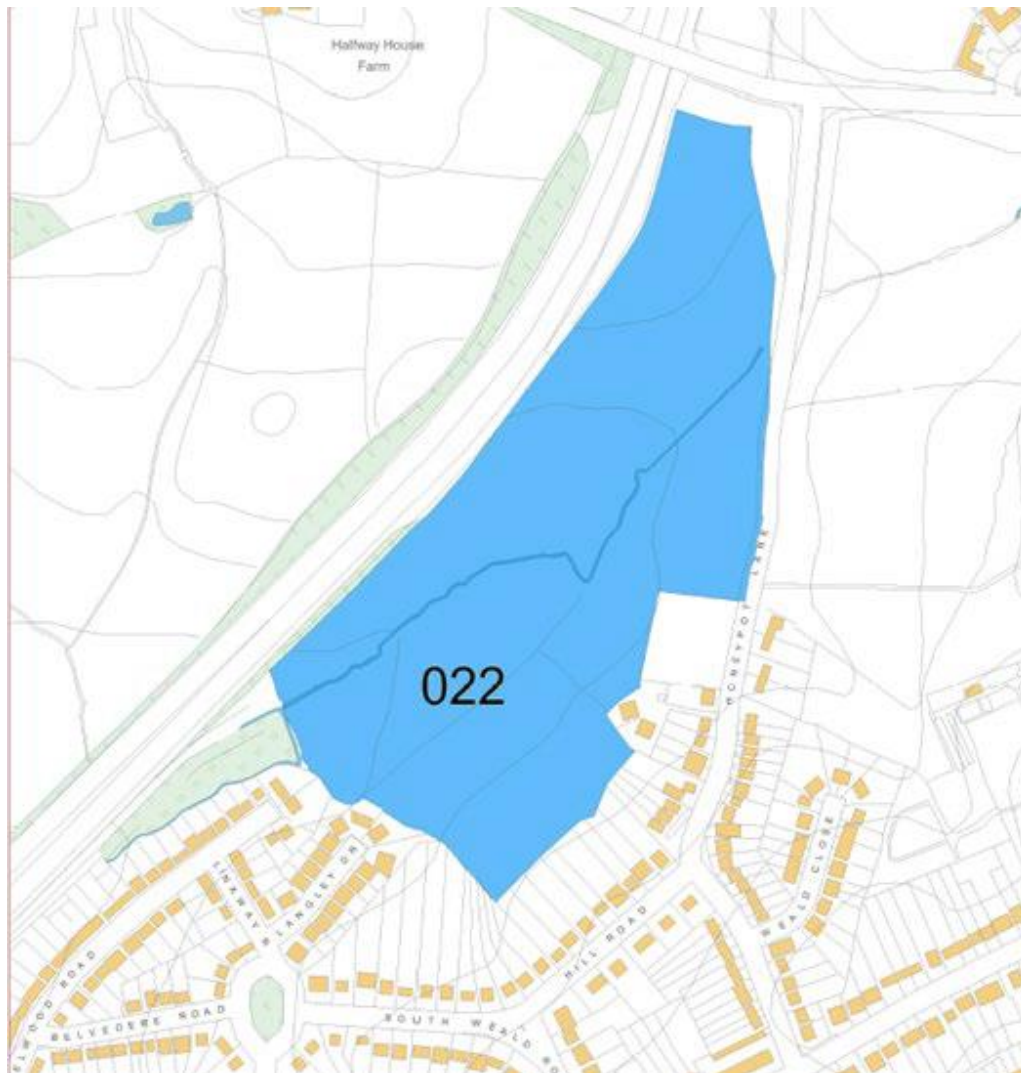
1.1 This document has been prepared by SJK Planning on behalf of the Honeypot Lane Residents Group. It sets out representations in respect of the Brentwood Draft Local Plan Preferred Site Allocations. The proposed housing site extends to 10.93 Hectares with a frontage to Honeypot lane of some 200 metres. It is open Green Belt Land with a number of trees and a water course running through the middle of the site.

1.2 The preferred site allocations document refers to the site as a “self-contained urban extension”, presenting the “Opportunity to enhance pedestrian links/green infrastructure through St Faiths Park”. Neither the Council nor the landowners have produced any information to show how the site itself might be developed, given the restraints in respect of highways, trees, the watercourse, topography and drainage.



The site is in an open Green Belt location.

1.3 A major concern for local residents is that the site would be served by a narrow lane and the inadequate junction between Honeypot Lane and London Road. The County Council as the Highway Authority have highlighted this as an issue.



The site as shown in the Preferred Site Allocations.

1.4 This document first describes the site and its surroundings. It then looks at the local plan consultation process dating back to 2009, and the purpose of the current consultation exercise. It then describes what we know about the development proposals for the site, although very little information is available. Section 5 sets out the planning objections to the proposed allocation with reference to the strategic objectives of the plan, localism and community involvement, the Metropolitan Green Belt, Sustainability and Infrastructure, Highway Issues, Residential Amenity, and Flood Risk and Drainage. In the light of the concerns it questions whether the Preferred Site Allocations document is either sound or robust.

2.0 The site and surrounding area

2.1 The site is roughly triangular in shape, with a wooded area at the northern end, which appears to have been excluded, and assumed not to be in the same ownership. The site extends to 10.93 Hectares, but the plan suggests that the developable area is 7.09 hectares.

2.2 It is laid to grass with a significant number of trees both along the boundaries and throughout the site. There is a tree lined water course running from its south west corner across to Honeypot Lane. The ground rises up from Honeypot Lane towards the A12, such that the higher part of the site is clearly visible from the surrounding area.



Looking south west across the site from Honey Lane

2.3 It is bounded on the longest south west side by the A12, which is both visibly and audibly intrusive when standing in the middle of the site. It is bounded on the east side by Honeypot Lane, which has a mature hedgerow along both sides. A good length of

the lane adjoining the site is of insufficient width for two cars to comfortably pass each other.

2.4 To the south of the site is the low density residential area residential area known as the Homesteads Estate. It is characterised by an informal street layout, strongly landscaped with street trees and well planted plot boundaries. The houses are generally set back and detached from one another.

2.5 On the other side of the lane from the site is St Faith's Park. It is managed to benefit wildlife and biodiversity whilst still allowing informal public access. The park covers 16 hectares of attractive open grassland fields bounded by mature hedgerows. There are also small areas of scrub and wet woodland, watercourses and ponds.



View across the allotments, with the site beyond, rising up toward the boundary with the A12.

2.6 The site is on the edge of the built up area, at a good walking distance from the town centre and station. The nearest bus routes are along the London Road.



Just inside the boundary with Honeypot Lane, looking south.



The road narrows down such that cars are often waiting to pass.



The A12 along the boundary, and looking south across the site.

3.0 The Local Plan Consultation Process

3.1 Brentwood Borough Council are preparing a new Local Plan, which will set out the long-term vision for how and where the Borough will develop over the next 15 years (to 2033) in line with what they identify as its unique local character – our "borough of villages".

3.2 The Local Development Scheme sets out the timetable for the Local Plan, a process that started in November 2009, and has comprised the publications as follows:-

Pre-production and Document Preparation Issues and Options Completed Published
November 2009

Preferred Options Consultation (Regulation 18) Completed July – October 2013

Analysis of Representations and Review of Strategic Issues (Regulation 18)
Completed November 2013 – May 2014

Strategic Growth Options Consultation (Regulation 18) Completed January –
February 2015

Draft Local Plan Consultation (Regulation 18) Completed Feb – March 2016

Sites Focused Consultation (Regulation 18) Q1

To follow this year it is intended that the following documents be produced:-

2018 Pre-submission Consultation (Regulation 19) Q3 2018

Submission to Secretary of State Q4 2018

3.3 Other documents have also been key to the progress of the plan such as the Draft Site Assessment July 2013.

3.4 The site at Honeypot Lane was first put forward by Barwood Land and Estates in response to the Council's call for sites. At that time the promoters of the site had suggested a developable area of 10.9 Hectares and a capacity of 436 dwellings.

3.5 Sites were assessed and the suggested housing sites were put forward in the Preferred Options Consultation (Regulation 18) Completed July – October 2013. This included a proposals for some 2,000 dwellings on greenfield land at West Horndon, but did not suggest any other greenfield sites in the Borough.

3.6 The Draft Site Assessment in 2013 looked at the land at Honeypot Lane against certain criteria. It was noted that the land was open Green Belt, and in respect of Access to Main Distributor Road, it reports concerns from the Essex County Council Highway Authority as follows:-

“Honeypot Lane is narrow in the vicinity of the sites frontage. May be a visibility problem with the site boundary hedges and bend. Visibility could be improved by removal of a substantial part of the hedge. Further consideration would need to be given regarding the capacity of the Honeypot Lane/London Road (A1023) junction.”

3.7 It was clear therefore that there were some fundamental highway issues with the site. There has been no indication as to how the road or the junction could be improved. The loss of mature trees and hedges along the side of the road would result in significant loss of visual amenity, and encroachment on the adjoining allotments.

3.8 One of the criteria for assessing sites is listed as “Highway capacity of surrounding network”. There is however no comment in this respect, and it is not known whether this aspect has been given any consideration.

3.9 In terms of access to buses and trains the assessment notes that the site is over 1 mile from Brentwood station.

3.10 It should be noted that the assessment does not refer to the number of trees on the site, the water course running across, to the significant change in levels, or the proximity of the A12.

3.11 It should also be noted that an assessment of whether the site is achievable had assumed that a development of some 440 dwellings would fund all the necessary highway improvements. The plan now suggests 200 dwellings.

3.12 Under heading “Outcome of site assessment for Draft Plan” the assessment concluded that the site should be discounted, as it did not meet the requirements of the Spatial Strategy.

Draft Local Plan Consultation (Regulation 18)

3.13 This document was published in 2016. It did not allocate sites but looking towards the next stage it did contain a spatial strategy as follows:-

“To meet local needs fully there will be limited release of Green Belt for development within transport corridors, in strategic locations to deliver self-sustaining communities

with accompanying local services, and urban extensions with clear defensible physical boundaries to avoid further sprawl and provide development swiftly.”

In addition it says that:-

“And that all development sites will be identified having regard to whether they:

- a. are accessible to public transport, services and facilities;
- b. will have no significant impact on the Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood-risk, air and water pollution; and
- c. are likely to come forward over the Plan period.”

The Current Consultation Document

3.14 The spatial strategy has evolved over the course of the plan being prepared and the current consultation has added some new strategic objectives, as set out below. In essence however the strategy has remained the same, as that being referred to in 2013.

3.15 The key strategic priorities as set out in the Preferred Site Allocations, for infrastructure planning include:

a) delivering the right infrastructure at the right time: ensuring that infrastructure to support new housing and employment opportunities, such as schools, health and transport are delivered at an appropriate scale and in a timely manner;

b) supporting strategic growth through sustainable infrastructure planning: there is a need to fully integrate strategic growth sites (such as Dunton Hills and Brentwood Enterprise Park) within a network of supporting infrastructure including public transport and active travel.

c) supporting high quality design: promoting a sense of place is considered a key local priority in infrastructure planning – helping minimise the impact of new infrastructure on local character and enhancing areas through innovative design which positively responds to local heritage and environments;

d) enhancing green infrastructure networks: improving the quality, range and connectiveness of the Borough's natural green assets; and

e) forward thinking and innovation-led: thinking ahead to Brentwood in 2040/50 and the changing dynamics of technological innovation and infrastructure priorities.

3.16 The structure of the document is as follows:-

Part 1 – Our Strategy for Growth:

- discussion about our vision, objectives and spatial strategy;
- the key drivers for growth and infrastructure implications; and
- how we have selected proposed site allocations plus a summary of the preferred allocations.

Part 2 – Preferred Site Allocations:

- pro-formas on each site setting out the area and key site access points; and
- a summary of opportunities and constraints.

3.17 Part 1 sets out the Strategic Objectives. Particularly relevant to this representation are the four main objectives that read as follows:-

Managing growth

SO1 - Ensure that we maximise sustainable growth opportunities within our built-up areas and on brownfield sites.

SO2 - Direct development growth to the Borough's transport corridors and urban areas in locations well served by existing and proposed local services and facilities.

SO3 - Support the sustainable growth of our existing larger villages to provide improved housing choice and protect services and facilities.

SO5 - Manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities.

Sustainable Communities

SO6 - Plan for housing that meets the needs of the Borough's population and contributes to creating inclusive, balanced, sustainable communities.

Environmental Protection and Enhancement

SO15 - Safeguard the Green Belt from inappropriate development and enhance its beneficial use.

SO16 - Protect and enhance valuable landscapes and the natural and historic environments.

Transport and Movement

SO21 - Improve public transport infrastructure and ensure development sites are well connected to bus and/or rail connections.

4.0 The Development Proposals

4.1 It is in the context of a protracted and very much stop/start process the Council has now arrived at some proposed site allocations. With all the sites there is very little evidence or research into how feasible or deliverable they are, and what the likely impacts are in terms of traffic generation, the suitability of surrounding roads, the degree to which Green Belt objectives might be prejudiced, and the potential harm to residential amenities.

4.2 The brief notes in the document referring to the site set out only some basic information. There are several unknowns as follows:-

- 1) There is no indication as to where the point of access would be to the site.
- 2) It is clear that major improvement would be required to Honeypot Lane to provide an adequate width and pedestrian access along a footpath. There is no information as to how this can be achieved.
- 3) The site extends to 10.93 Hectares, but there is a reference to a smaller area being developable. There is no explanation as to how this area has been calculated, and what land-uses might occupy the subtracted area. In this context the allocation does not consider how many trees should be retained, whether the watercourse will be protected, what width of buffer along the A12 will be required to provide adequate noise attenuation, and how much land the suggested Care Home might occupy.
- 4) The site slopes down from the A12 to Honeypot Lane. This will be a constraint in arriving at a suitable form of development.
- 5) A site for 200 dwellings will have a significant impact on the local road network and junction, and major funding will be required for improvements. It is not clear whether this will come from the value of the site, or from a central fund.

5.0 The Planning Objections

5.1 This section sets out the objections to the proposed allocation of land at Honeypot Lane. The representations are set out under the headings as follows:-

- 1) Major development at Honeypot Lane and the Strategic Objectives.
- 2) Localism and community involvement.
- 3) Metropolitan Green Belt.
- 4) Is Honeypot Lane in a sustainable location?
- 5) Impact on roads and junctions.
- 6) Impact on the residential amenities.
- 7) Flood risk and drainage.
- 8) Is the Preferred Site Allocations document sound and robust?

1) Major development at Honeypot Lane and the Strategic Objectives

5.2 The allocation proposes a major development of a greenfield site on the edge of the built up area. When the site was originally put forward the Council rejected it because it did not meet the Spatial Strategy. The strategy in the Draft Plan 2016 is clear that:-

“To meet local needs fully there will be limited release of Green Belt for development within transport corridors, in strategic locations to deliver self-sustaining communities with accompanying local services, and urban extensions with clear defensible physical boundaries to avoid further sprawl and provide development swiftly.”

5.3 The current document now says that the Council have “refreshed” the Strategic Objectives. In particular new objectives have been introduced to direct more development towards the villages. In terms of the Green Belt however it is still clear that Environmental Protection and Enhancement is a focus of the Plan, with the objectives stated as follows:-

SO15 - Safeguard the Green Belt from inappropriate development and enhance its beneficial use.

SO16 - Protect and enhance valuable landscapes and the natural and historic environments.

5.4 Our objection is on the grounds that the allocation is contrary to both the previously stated and now “refreshed” objectives. The site does not constitute a limited release in the Green Belt. A development of 200 houses on a prominent Green Belt site is entirely inappropriate, and will not enhance its beneficial use.

5.5 The plan contains scant information to support the allocation. Only the boundaries and location of the proposed site, and the number of dwellings it might accommodate. There is no explanation as to why the site is thought to be suitable for this scale of development.

2) Localism and Community Involvement

5.6 The National Planning Policy Framework says that local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.

5.7 It also says that:-

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

5.8 In passing the Localism Act the Government has said that:-

“Too often, power was exercised by people who were not directly affected by the decisions they were taking. This meant, understandably, that people often resented what they saw as decisions and plans being foisted on them.”

5.9 The plan and the consultation process have so far been a top down process, with little regard for the involvement of the local community. The residents have consistently sought more information regarding the site, and the evidence base that has been used to justify its inclusion. There has been a very limited response.

3) Metropolitan Green Belt

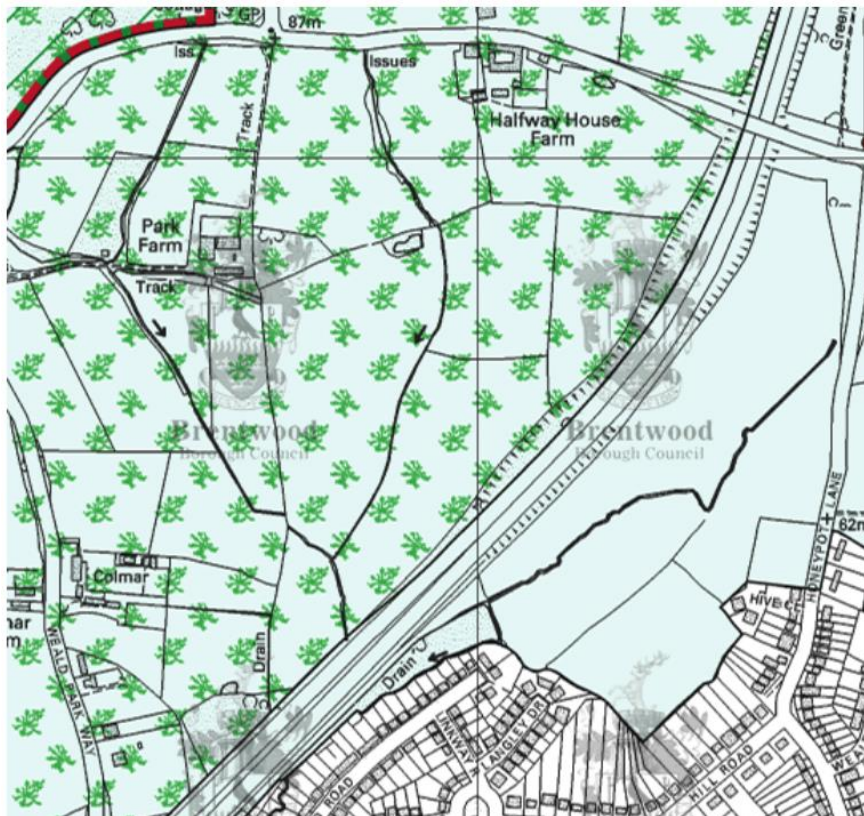
5.10 The National Planning Policy Framework states that:-

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

5.11 The allocation is within the Green Belt. National planning guidance is clear that development in the Green Belt is by definition inappropriate and harmful.

5.12 Exceptional circumstances must exist to justify the loss of Green Belt land. The Government has clarified that housing demand is unlikely to constitute the exceptional circumstances to justify such loss.

5.13 The site would project out into open Green Belt land, bounded only by narrow lanes, with open fields beyond. There has been no assessment of the contribution the site makes to the Green Belt. It is an open greenfield site with an attractive natural landscape, mature trees, and a watercourse. It is adjacent to a park, with a special landscape area on the other side of the A12. It is elevated and highly visible from the surrounding area. Any form of development on the site will have a harmful impact on the openness of the Green Belt.



The site as shown in the current Local Plan Proposals Map. The area on the other side of the A12 is designated as Special Landscape Area.

4) Sustainability and Infrastructure

5.14 Whether new development can be proved to be sustainable is central to planning policy.

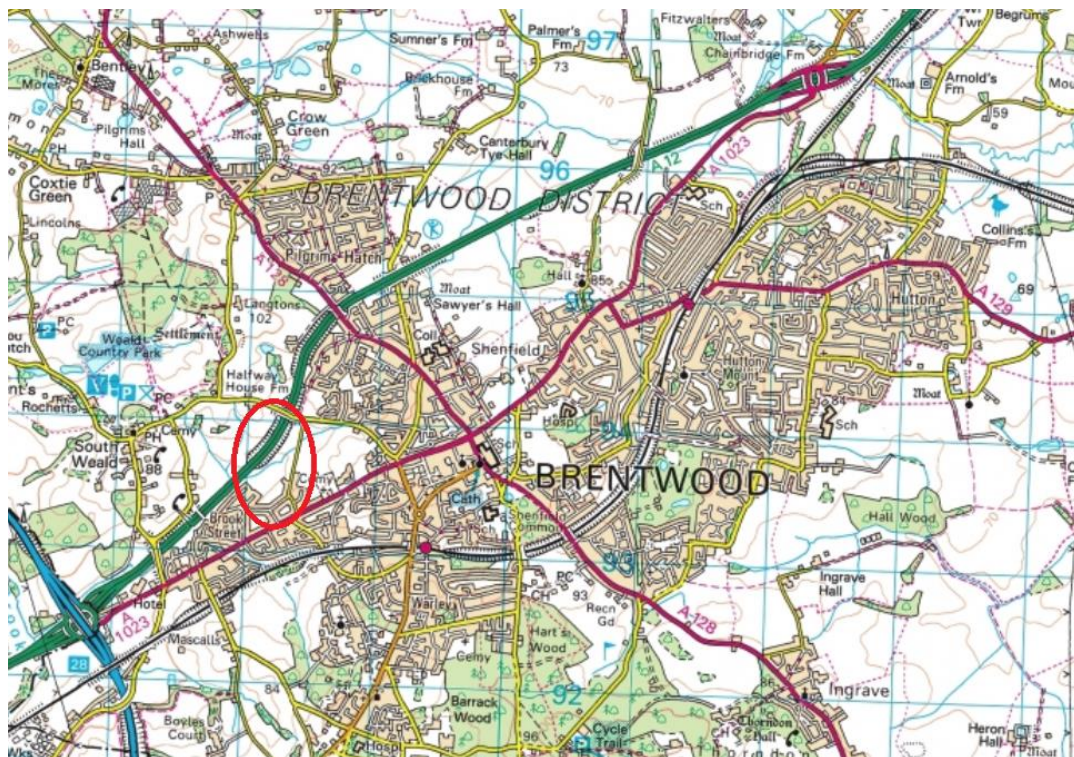
5.15 The allocation makes reference to an evidence base and infrastructure, but is only able to say that an “Infrastructure Delivery Plan is forthcoming”. No other evidence is put forward.

5.16 National guidance states that Local Planning Authorities should assess the quality and capacity of infrastructure, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, and flood risk, and its ability to meet forecast demands. This has not been done.

5.17 Local residents are being asked to comment on a major proposal, having been presented with only an outline of what is proposed. It is not known therefore what benefits, if any, there might be for the area, or how the scheme might seek to mitigate against the many harmful impacts.

5.18 Sustainable is defined as “ensuring that better lives for ourselves don’t mean worse lives for future generations”. In practice the essential requirement is that new homeowners will not be over dependent on the car for journeys to work, school, shops, leisure activities, and other services and amenities.

5.19 The proposed site is on the western edge of the town, over 1 mile from the centre of the town and the railway station. It is not within reasonable walking distance of schools, facilities, or services. If the residents of the new development have no choice but to make most journeys by car, the site does not offer a sustainable location.



The site is on the edge of the built-up area, a good distance from the town centre

5) Impact on roads and junctions

5.20 A development of some 200 houses would increase traffic levels on roads and junctions that are already at full capacity. There is no indication as to where the main access to the site would be located, or what improvements to Honeypot Lane and Weald Road might be necessary, or how they will be funded.



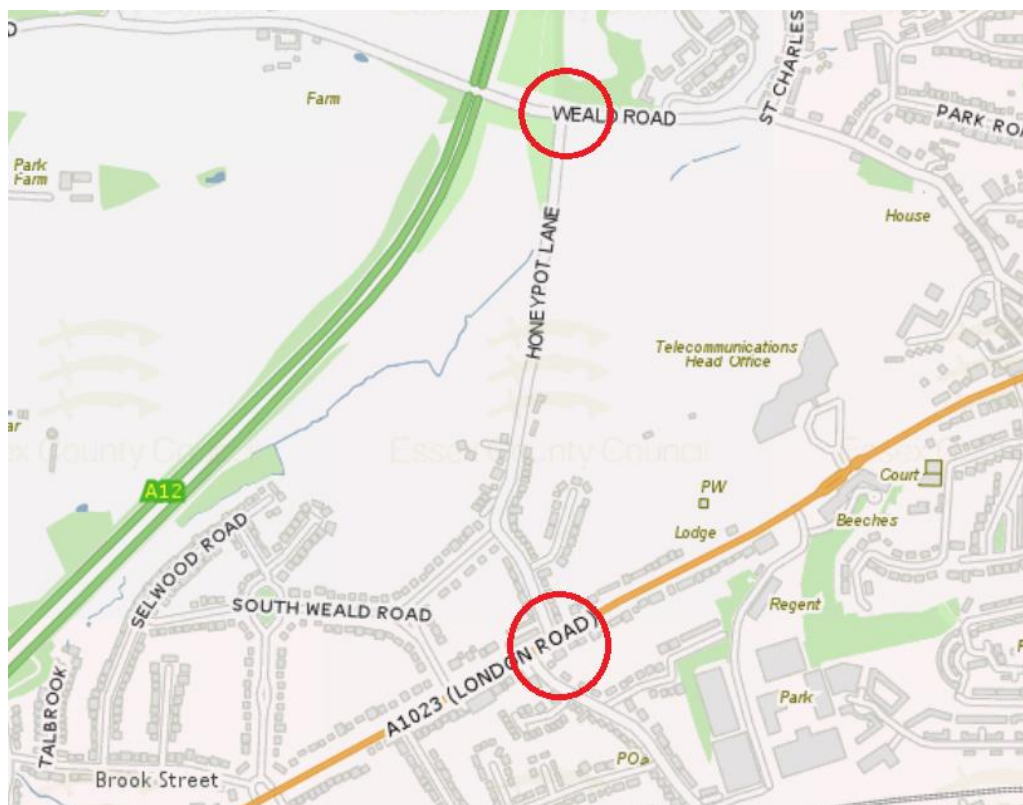
The long narrow stretch of Honeypot Lane. Widening would destroy the vegetation and encroach on the allotments.



The junction of Honeypot Lane and London Road. Although the Highway Authority have indicated that the capacity of the junction is an issue, there is no practical way to make any improvements.

5.21 The Council's website indicates that the impact and the need for infrastructure supporting new development will be considered in greater detail by the Infrastructure Delivery Plan and the Local Plan. The Council have only just on (29th January 2018) launched an infrastructure Delivery Plan website. There is no information about Honeypot Lane.

5.22 Residents in the area are also concerned that planning permissions have been granted to build 70 dwellings at the Old Police Station site in London Road, and for an office conversion in Hubert Road, to provide over 120 units. The developments will increase traffic levels in the area and put further pressure on the junction of Honeypot Lane and London Road.



The junctions at either end of Honeypot Lane.

6) Impact on the residential amenities

5.23 The proposals are not clear on the mix and proportion of land uses, with what appears to be a leaning towards an almost wholly residential scheme. There is no

question that a development of the scale proposed will greatly increase the volume of traffic passing through the surrounding residential streets.

5.23 Overall the concern is that the people of the local community are most likely to suffer the harmful impacts of the development by way of increased traffic, overlooked back gardens, loss of rural character, without any discernable benefits.

7) Flood risk and Drainage

5.25 There is no evidence that the Council has carried any assessment of drainage in the area. Residents are concerned about surface water drainage and how the water course the site will be accommodated within a housing layout. Much of the site is known to be permanently waterlogged. A full survey and report is required in this respect.

8) Is the Preferred Site Allocations document sound and robust?

5.26 National guidance states that:-

“Local Plans should develop robust and comprehensive policies that set out the quality of developments that would be expected of the area, responding to local character and being visually attractive.”

5.27 A local planning authority should also submit a plan for examination which is “sound”, in respect of how it is prepared, whether proposals are properly justified, whether it can be delivered, and whether it is consistent with national policy.

5.28 Given the level and extent of the concerns as set out above, the plan clearly has fundamental shortcomings. It is not therefore sound or robust.

5.29 The Borough Council, in consultation with residents in the area, is urged to carry out a study, focusing on infrastructure, services, amenities, and public transport. Only

after this has been carried out can the plan be said to be responding to the needs of the local community.

6.0 Conclusion

6.1 We have carefully read the current consultation document. We have investigated the concerns of local residents, and looked into the characteristics of the site and the surrounding area. The allocation has been considered in the context of the Council's stated Strategic Objectives. Lack of information with regard to how the site might be developed and how the necessary infrastructure can be provided, has compounded the concerns, about both environmental and highways impacts.

6.2 We have looked objectively at the proposed allocation in the context of both local and national planning policies. The objections are therefore valid and soundly based. This is not a subjective or "nimby" response.

6.3 The National Planning Policy Framework requires an integrated approach to the provision of housing with accessible local services, in order to provide a high quality built environment. The Borough Council are therefore attempting a consultation exercise on a proposal which is at best sketchy, is poorly researched, and premature in terms of an evidence base. Overall therefore it is ill-conceived. The Preferred Site Allocations document and the allocation of land at Honeypot Lane is not therefore sound or robust.