



**BRENTWOOD
BOROUGH COUNCIL**

Brentwood Draft Local Plan Preferred Site Allocations

January 2018

COMMENT FORM

From 29 January to 12 March 2018 we are consulting on the next stage of the Brentwood Local Plan: Preferred Site Allocations. You can view and comment on the consultation document online at www.brentwood.gov.uk/localplan

Alternatively, please use this form to share your views on the contents of the document.

All responses should be received by Monday 12 March 2018

Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email them to planning.policy@brentwood.gov.uk

Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form, you are agreeing to these conditions.

PERSONAL DETAILS

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YOUR COMMENTS

Please indicate which section(s) of the Preferred Site Allocations document that you are commenting on (where applicable please clearly state the section/heading or paragraph number):

Part 2 – Preferred Site Allocations:
Brownfield Site Allocations

Please specify if you Support, Object or are providing a General Comment:
(tick as appropriate)

Support

Object

General Comment

Comments (please use additional sheet if required):

The Preferred Site Allocations Document lists 13 brownfield sites with an estimated capacity of around 1700 dwellings. Comparisons with the Draft Plan's proposals are complicated by a re-classification of some sites, with a distinction now being made between brownfield and what are now called Greenfield Land within Settlement Boundaries and Urban Extensions.

Of the proposed brownfield sites, four are new sites since publication of the 2016 Draft Plan. The remainder were included, but five of the Draft Plan's sites are not being taken forward. In our Draft Plan representations, we expressed our doubts over site numbers 005 Essex County Fire Brigade HQ and 013B Warley Training Centre, and note that these are now omitted.

The four new sites are:

- Brentwood Station Car Park – this was originally proposed in the 2011 SHLAA
- Eagle and Child PH, Shenfield – this appears to be a new site altogether
- Ford Offices, Eagle Way, Warley – previously included as an employment land allocation
- Land at Crescent Drive, Shenfield – another previously unmentioned site.

Two town centre sites were mentioned in the Draft Plan, the Baytree Centre and William Hunter Way. The Preferred Site Allocations Document does not refer to the Baytree Centre. It does, however, include the William Hunter Way site, described in the Draft Plan as a strategic site although not included in that document's "Figure 7.2 – List of Housing Land Allocations".

The Draft Plan included the industrial estates at West Horndon as proposed brownfield housing land allocations. However, the Ford Offices at Eagle Way, Warley was scheduled as an employment land allocation, where redevelopment or changes of use for non Class B uses would be permitted only in certain defined circumstances. Both sites are now preferred housing allocations.

see continuation sheet

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Part 2 – Preferred Site Allocations:

Brownfield Site Allocations

continuation sheet

A brief examination of the history of brownfield sites being presented as potential housing land allocations illustrates the uncertainty that surrounds when, and if, they will become available.

Of the sites in the current list, one, the Eagle and Child PH at Shenfield, appears for the first time. Pub closures have been, and continue to be, a potential source of brownfield housing land. However, we think these should be regarded as windfall sites, rather than specific land allocations. The Eagle and Child is a small site, with an estimated capacity of 20 units. The site details note a potential business loss or relocation. This suggests the pub is still in use. Taken together with the reported existing lag of starts behind permissions already granted, it seems to us that there is still some uncertainty about its coming forward, despite the site assessment's forecast of "early delivery".

The proposed allocation of sites 117A and B at Ford Offices, Eagle Way, is another addition since the publication of the Draft Local Plan. The Ford Offices site indicates a fluidity about what will, or will not, remain as employment land. Site 186 was not shown as a brownfield site with potential in the 2011 SHLAA.

The details for site 186, land at Crescent Drive, Shenfield, note that it was formerly used by the National Blood Service.

The town centre sites of Baytree Centre and William Hunter Way have been under consideration since we first started making representations to the local plan process. Town centre redevelopments are complex and influenced by many factors. Whilst these two developments will probably happen, their timing must remain uncertain.

We have objections to the Eagle and Child PH site being included, which we think should be included in the windfall allowance. Our principal concern is the uncertainty surrounding a number of these brownfield sites and the consequences for an early boost to the current serious undersupply of available housing land.