

**BRENTWOOD
LOCAL PLAN
PRE-SUBMISSION
CONSULTATION
REPRESENTATIONS
IN RESPECT OF
DRAFT POLICY R09:
LAND OFF WARLEY HILL**

Quality Assurance

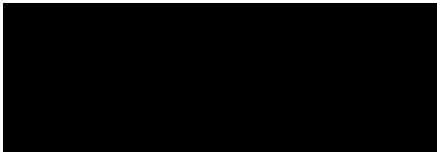
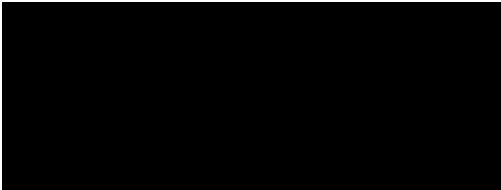
Site name:	Land off Warley Hill, Warley
Client name:	Essex Partnership University NHS Foundation Trust
Type of report:	Regulation 19 Pre-Submission Local Plan Representations
Prepared by:	Ryan Nicholls BA (Hons) MA
Signed	
Date	19 March 2019
Prepared by:	Steven Butler BSc (Hons) MSc MRTPI
Signed	
Date	19 March 2019



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1.0 Introduction

- 1.1 These representations have been prepared on behalf of Essex Partnership University NHS Foundation Trust (“EPUT”) in response to Brentwood Borough Council’s (“BBC”) public consultation on the Regulation 19 Pre-Submission Local Plan (“the emerging Plan”) in respect of land off Warley Hill, Warley (“the Site”). The land the subject of these representations is shown on the accompanying Site Location Plan at **Appendix 1**.
- 1.2 EPUT owns the Site which is the subject of a proposed allocation in the emerging Plan for the development of around 43 dwellings. Primarily, the consultation seeks responses regarding the soundness of the emerging Plan as set out in the National Planning Policy Framework (NPPF), published in February 2019.
- 1.3 Our comments on the emerging Plan are made having regard to the NPPF, which at paragraph 35 states “Plans are considered sound if they are:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.”
- 1.4 Accordingly, these representations **fully support the proposed allocation of land off Warley Hill** under Policy R09 because the allocation of the site for residential development is justified, effective and consistent with national policy.
- 1.5 Our response to the emerging Plan’s strategic policies is provided below in the following section, with our comments on the proposed site allocation at Policy R09 thereafter. These representations are supported by:
- A completed version of the Comments Form at **Appendix 2** of this report; and
 - Urban Design Strategy at **Appendix 3** of this report.

2.0 Our Support for the Strategic Policies

Chapter 2. A Borough of Villages

Settlement Hierarchy

- 2.1 Warley falls within Settlement Category 1 in the emerging Plan Settlement Hierarchy, the highest-ranking settlement type. Paragraph 2.11 identifies that the Brentwood Urban Area, which includes Warley, and Shenfield offer the most scope for growth in accordance with sustainable development principles. Urban extensions into the Green Belt are proposed in specific locations with clear physical boundaries and accessible to local services and transport links.
- 2.2 Category 1 sites are described in Figure 2.3 as “*providing a wide range of services and opportunities for employment, retail, education, health and leisure facilities to the immediate residential areas as well as to the wider population in the borough. They are typically highly accessible and well served by public transport provision, including rail services, and existing infrastructure.*”
- 2.3 This description appropriately aligns with the characteristics of Warley as part of the Brentwood Urban Area, in that it provides a wide range of services and employment opportunities, is highly accessible and well served by public transport – this is demonstrated by being only 800m from Brentwood mainline / Crossrail station. We consider that Brentwood Urban Area’s placement at the top of the Settlement Hierarchy, including Warley, is appropriate and **justified**.

Chapter 3. Spatial Strategy – Vision and Strategic Objectives

Housing Need

- 2.4 Housing need is discussed at paragraphs 3.7 – 3.9 of the consultation document. In planning for residential growth, the emerging Plan states its commitment to planning positively to increase the supply of new homes. The emerging Plan states it will allocate land to exceed the identified local housing need to provide flexibility in the supply and delivery of sites. We support the approach to significantly boost the supply of new housing because it demonstrates that the Plan is **positively prepared**.
- 2.5 The flexibility benefits of allocating sites to exceed the identified local housing need can only be realised if the supply of those sites is not unduly restricted to arbitrary time periods. The Local Development Plan Housing Trajectory identifies anticipated delivery timescales for allocated sites, but this should not prejudice the early delivery of sites anticipated to be built out later in the emerging Local Plan period. In order to be considered **positively prepared**, allocated sites should be delivered as soon as they are available.

Transit-orientated Growth and the Growth Areas

- 2.6 Paragraphs 3.11 and 3.21-3.22 recognise the existing pattern of development and the presence of two key infrastructure corridors and that these inform the spatial approach to growth in the

emerging Plan. These are the Central Brentwood Growth Corridor, comprised of the A12, the Great Eastern Main Line to London Liverpool Street and the new Elizabeth Line/Crossrail; and the Southern Brentwood Growth Corridor comprised of the A127 and the London, Tilbury and Southend Railway to London Fenchurch Street Station.

- 2.7 Allocating development in these transit corridors ensures that new homes will be sustainably located, linked to existing service centres through proximity and accessibility to strategic transport infrastructure. We consider this an appropriate and **justified** strategy.
- 2.8 Allocation of Land off Warley Hill fits appropriately with this approach because it is located within the Central Brentwood Growth Corridor, approximately 800 metres from Brentwood mainline / Elizabeth line/Crossrail station. Warley Hill, Albert Street and Walter Boyce Centre bus stops are all less than 100m from the Site, with routes into Brentwood town centre and Romford. The Site is less than 2 miles from Brentwood town centre, which offers public transport routes to Grays, South Ockendon, Chelmsford city centre, Basildon town centre, Billericay and Shenfield among other destinations. It is within 300m of a local supermarket, petrol station, sandwich bar, GP surgery, primary school and employment opportunities. The site is easily accessible from the A12 and M25.
- 2.9 Land off Warley Hill is therefore a highly suitable site, sustainably located in the heart of the Central Brentwood Growth Corridor, with accessibility to a wide range of services, facilities and sources of employment reflected in its location within Settlement Category 1 in the emerging Plan Settlement Hierarchy. With such infrastructure already in place around the Site, delivery of dwellings can commence imminently, and the Site should not be held back to latter parts of the emerging Local Plan period in line with the Local Development Plan Housing Trajectory.

Chapter 4. Managing Growth

Policy SP01 Sustainable Development

- 2.10 This policy advocates a positive approach to considering developments that accord with the presumption in favour of sustainable development as set out in paragraph 11 of the NPPF. Clearly this is **consistent with national policy** and we support this approach. Paragraph C of the policy aligns with the NPPF requirement for development that accords with the emerging Local Plan to be approved without delay unless material considerations indicate otherwise. Land off Warley Hill is a proposed allocation and a planning application brought forward for the development of the site in accordance with this and should therefore be approved without delay.

Policy SP02: Managing Growth

- 2.11 This policy seeks to direct development to the site allocations set out in the Local Plan and within the highly accessible locations along transit/growth corridors. Land off Warley Hill would accord with both of these principles, so we support this policy.

Chapter 8. Natural Environment

Policy NE13: Site Allocations in Green Belt (8.113)

- 2.12 We support the release of sites from the Green Belt for development as a **justified** approach given the lack of alternatives in the Borough. This is **consistent with national policy**, namely paragraph 136 of the NPPF, which makes allowance for the alteration of Green Belt boundaries through the preparation or updating of Plans where exceptional circumstances are fully evidenced and justified.
- 2.13 BBC recognises that Green Belt release is necessary to meet the Borough's housing needs. BBC has insufficient available brownfield land within existing urban areas to deliver this need. It falls on Green Belt land to accommodate a proportion of the overall housing requirement. Within this context it therefore follows that the most suitable available brownfield sites within the Green Belt should be allocated for residential development.
- 2.14 Land off Warley Hill represents an entirely suitable development site as an urban extension to development on the south of Brentwood Urban Area. With existing residential and commercial development to the south and east, the former Warley Hospital buildings to the north-west and Pastoral Way to the north, the Site is identified as making only a "moderate" contribution to the purposes of including land within the Green Belt according to the BBC Green Belt Study (November 2018). It should be noted that the assessments of alternative sites range predominantly from moderate to high and the Site is therefore among the least sensitive performing Green Belt sites against the purposes of including land in the Green Belt, **justifying** its release for allocation. Releasing sites such as this takes pressure from other land parcels that perform a more important Green Belt function and minimises the impact on the Green Belt as far as is possible, **consistent with national policy**.

3.0 Our Support for Policy R09: Land off Warley Hill

- 3.1 We **fully support** the allocation of this Site for residential development and EPUT is committed to the delivery of the Site in accordance with the criteria set out in policy R09. This is for the reasons below.

The Site is surplus to NHS requirements

- 3.2 The Site is sustainably located, previously developed, surplus to its former public sector requirements and is currently vacant. It contains 6 buildings with associated outbuildings and structures. These buildings were formerly used to support the provision of NHS services and was formerly part of the wider Warley Hospital site that has now been redeveloped for housing. The Site was originally developed in the 1930s and initially provided staff accommodation but more recently the existing buildings have also been used for various NHS health care-related purposes, including a drop-in service and care for people with learning difficulties. This was the case up until February 2012 when the need for the facility by the NHS ceased and the properties were vacated.
- 3.3 Essex Partnership University NHS Trust (EPUT) currently maintains the Site but the prolonged vacancy has increased the risk of the following issues occurring:
- Vandalism of the buildings;
 - Anti-social behaviour;
 - Unauthorised occupation of the buildings;
 - Neighbouring amenity being jeopardised;
 - Vermin nuisance to local residents; and/or
 - Landscaping / trees becoming overgrown.
- 3.4 These are practical reasons to support the redevelopment of the Site in the short term. In addition, maintaining and securing the current buildings costs the NHS money and these finances may be better used in a positive way to support improved healthcare services.

The Site's removal from the Green Belt is fully justified

- 3.5 We support the Site's removal from the Green Belt because this is **consistent with national planning policy**. BBC recognises that exceptional circumstances exist and warrant the release of Green Belt to accommodate the Borough's housing need, in accordance with NPPF paragraph 135. Furthermore, development of the site would contribute towards sustainable patterns of development because the site is located within the heart of the Central Brentwood Growth Corridor, consistent with NPPF paragraph 138, and adjacent to the existing development boundary of the Brentwood Urban Area.
- 3.6 Paragraph 139 of the NPPF states "*when defining Green Belt boundaries, plans should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*" The B186, Warley Hill, along the Site's eastern boundary, currently forms the Green Belt boundary. The Site is bounded to the west by Clement's Wood, designated as an ancient woodland, secondary woodland habitat and a Local Wildlife Site (LoWS) as described in the

Brentwood Borough Local Wildlife Site Review (2012). The woodland's designated status on the western boundary of the Site provides certainty that the redefinition of the Green Belt boundary would follow this feature would be strong, recognisable and permanent, in accordance with NPPF paragraph 139. For ease of reference, we have included an extract of the designated site.

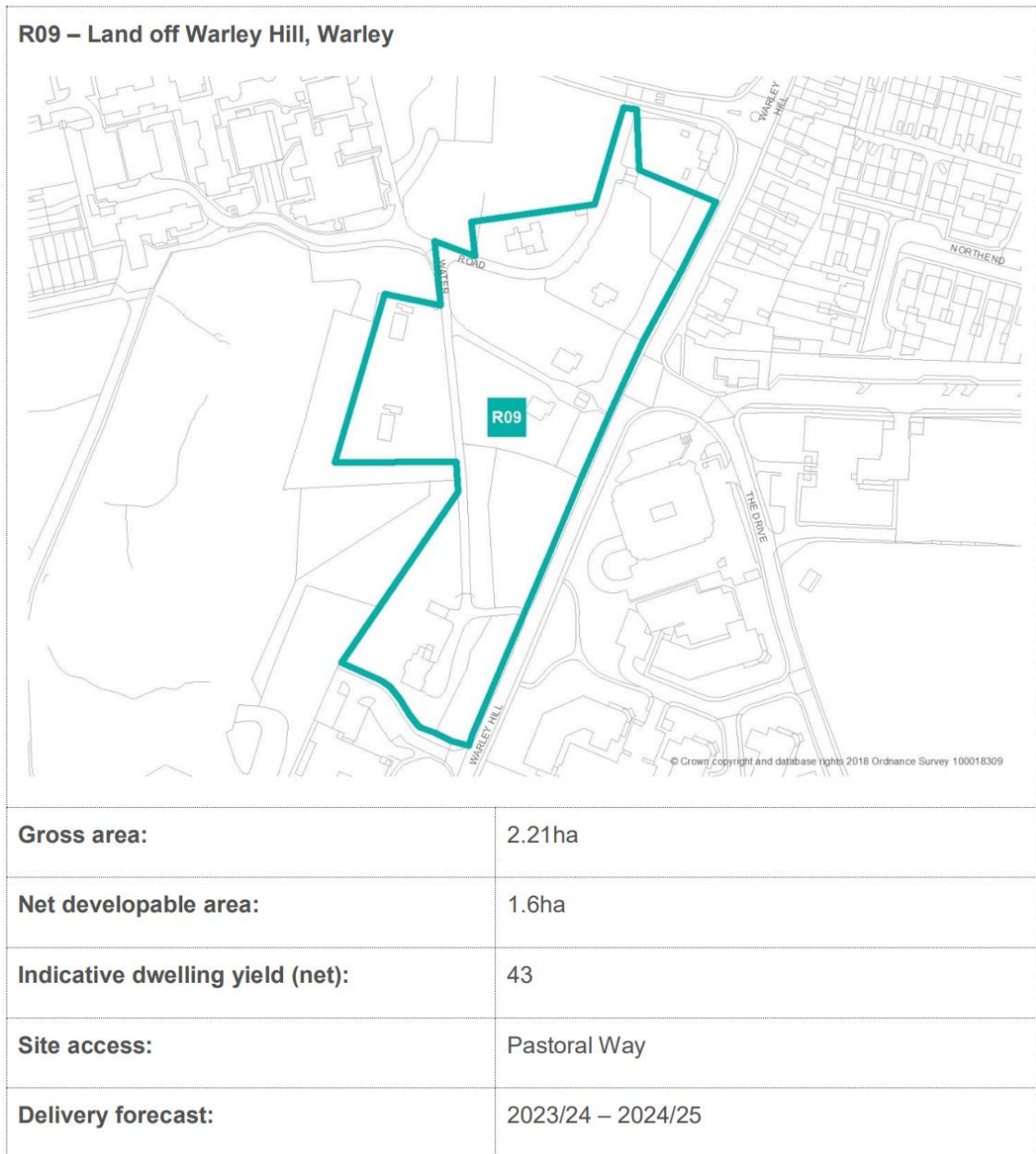


Above: Extract from BBC's Local Wildlife Site Review: Bre61 Clement's Wood – the Site is adjacent to eastern boundary of Clement's Wood.

- 3.7 The Site is controlled in its entirety by EPUT and is available and deliverable now to contribute to meeting the local housing need requirements in the emerging Plan and BBC's five-year housing land supply. The deliverability of the masterplan proposals for the Site is demonstrated further in the section below.

Compliance with Policy R09's Development Principles

- 3.8 The extract below shows the allocation within the consultation document:



3.9 Policy R09 also sets out specific Development Principles to be considered when developing detailed proposals for the Site. These are set out and underlined below and we fully support them. Our design response is summarised beneath each criterion:

A. Amount and Type of Development

a. provision for around 43 new homes of mixed size and type:

We fully support this quantum of development and the accompanying Urban Design Strategy demonstrates the deliverability of this quantum of development on the Site.

B. Development Principles

a. vehicular access via Pastoral Way:

The accompanying masterplan in the Urban Design Strategy confirms that vehicular access would be provided via Pastoral Way, where there is a current vehicle access into the Site.

b. preserve the setting of nearby listed buildings:

The Heritage Assessment (summarised within the Urban Design Strategy) concludes that The Firs and Lyndhurst buildings are not listed and can be demolished and Shenleigh, Bramley and Beeches buildings are curtilage listed but are relatively ordinary in appearance and can be demolished. Greenwoods is similarly listed and of architectural value, so is proposed for retention within the scheme. The Tower House at Warley Hospital is also a grade II listed structure and the masterplan includes extensive tree belts and open space in its vicinity to preserve the setting.

c. provide for sensitive landscaping throughout the site and consider the need for the retention of some existing trees on site where appropriate:

The masterplan shows a generously landscaped scheme, with existing trees of value retained and the provision of open space and landscaping throughout.

C. Infrastructure Requirements

a. the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue:

The inclusion of significant areas of landscaping and open space provides opportunities to deliver a bespoke drainage strategy on the Site, which would be designed in detail at the appropriate stage of the development of the proposals.

Constraints and Opportunities

3.10 The accompanying Urban Design Strategy provides an assessment of the opportunities and constraints of the Site, summarised by the following key points:

- **Green Belt:** The Site is currently located within the Green Belt although the emerging Local Plan proposes its removal and allocation for residential development.
- **Arboriculture:** There are significant existing trees on the Site with related constraints, particularly Category A and B to be retained and the presence of Tree Preservation Order TPO 10/91. Presence of Ancient Woodland within Clement's Wood.
- **Heritage:** Presence of heritage building 'Greenwoods' and the setting of the Listed Victorian Water Tower, both of which are considered worthy of retention.
- **Biodiversity and open space:** There are opportunities to enhance the biodiversity offering on the Site and potentially through the retention of existing green open space. Bats, birds and breeding mammals surveys are necessary which may determine further ecological constraints. These surveys would be undertaken at an appropriate stage of the development of the proposals.
- **Cyclists and pedestrians:** It is necessary to provide adequate circulation routes and provision for cyclists and pedestrians. Pedestrian connections to Warley Hill are necessary for pedestrians to access public transport bus routes.

Our Design Approach

- 3.11 In responding to the opportunities and constraints, the detailed design for the Site will provide high-quality development in a landscape-led scheme, illustratively depicted in the accompanying Urban Design Strategy at Appendix 3 of this report and as shown below:



Above: Indicative Layout contained within the accompanying Urban Design Strategy

- 3.12 The indicative masterplan contains the following key features:
- Protection of the existing listed building Greenwoods;
 - Creating a more appropriate and grander setting for the adjacent Listed Water Tower through the careful placement of buildings and open space;
 - Protection and retention of existing trees, introduction of a new planting scheme and biodiversity measures;
 - Integration of a mix of dwelling types including detached houses, town houses, and potentially live-work units;
 - Creation of a more curvaceous form to the site access road and greater connectivity to the wider area.
- 3.13 This demonstrates that a high-quality development scheme incorporating substantial areas of landscaping and open space can be delivered alongside approximately 43 dwellings in a highly sustainable location.

Contribution towards the 5-year housing land supply

- 3.14 EPUT is fully committed to realising the delivery of the allocated development in the short-term and intends to engage in formal pre-application discussions with BBC imminently with the intention of progressing with an outline application as soon as is reasonably possible.
- 3.15 BBC's delivery assumptions are that the allocation would be completed within years 2023/4 and 2024/5. Whilst we consider this to be pessimistic, it does fall within the first five years from now so we concur with the assessment that the allocation would contribute towards the five-year supply. Securing this allocation would also ensure that BBC would maintain a strong and varied portfolio of sites that can deliver immediately following adoption of the Local Plan and underpin supply pipeline whilst the large strategic sites undergo the requisite lead-in.
- 3.16 We therefore fully support Policy R09.

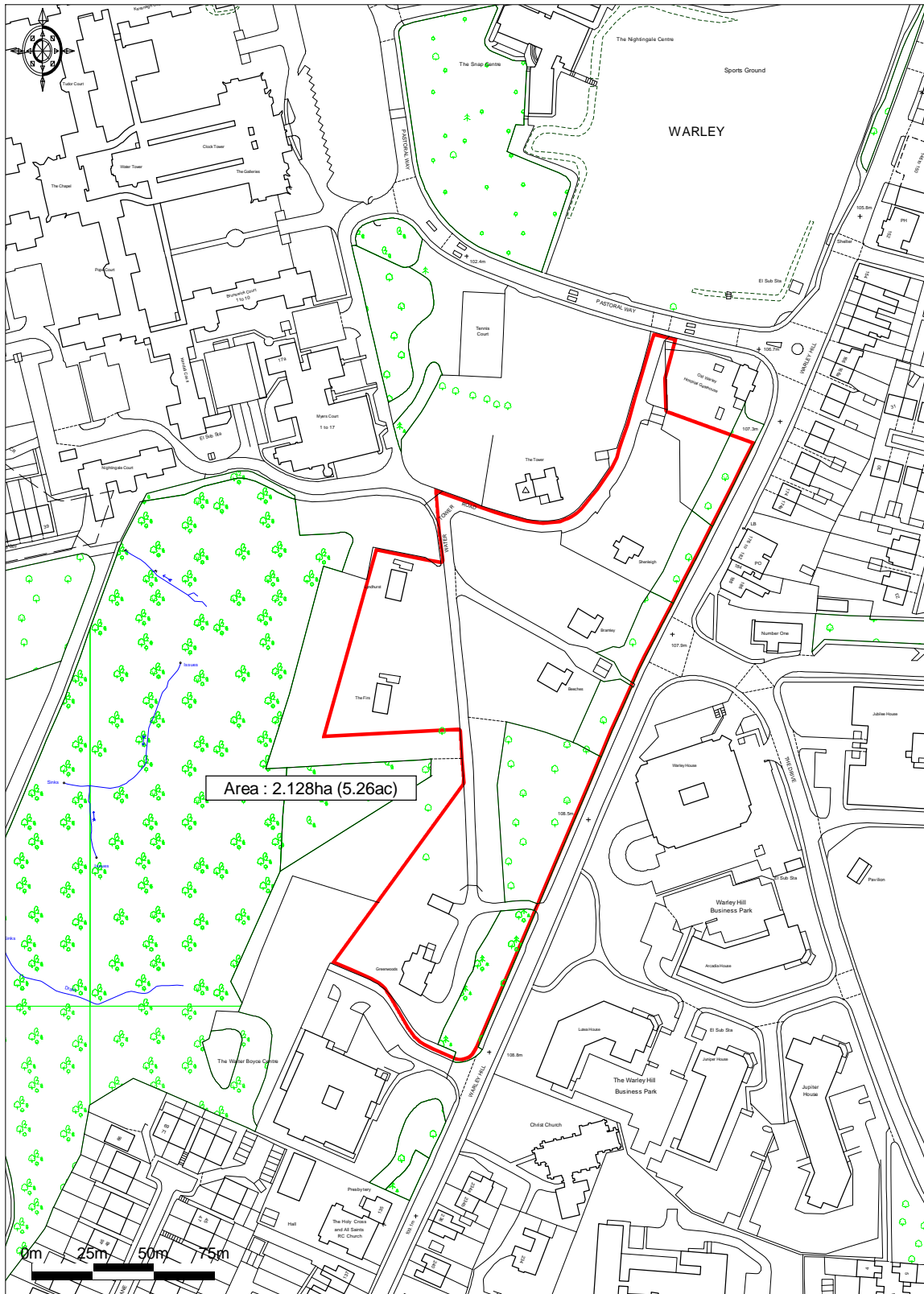
4.0 Conclusion

- 4.1 These representations have been prepared on behalf of Essex Partnership University NHS Foundation Trust in response to BBC's emerging Plan consultation in respect of Land off Warley Hill. EPUT owns the Site.
- 4.2 We **support the proposed allocation of Land off Warley Hill** under Policy R09 because the allocation of the site for residential development is **justified** and **consistent with national policy**.
- 4.3 Allocating sites to exceed the identified local housing need is **consistent with national policy**, whereby housing targets are viewed as a minimum and should be exceeded where possible to ensure flexibility in housing delivery. We also support the proposed policies relating to Growth Areas, the Settlement Hierarchy, Managing Growth and the general approach to directing growth to the most sustainable locations. BBC recognises that exceptional circumstances exist and warrant the release of Green Belt to accommodate the Borough's housing need.
- 4.4 The Land off Warley hill is located within the heart of the Central Brentwood Growth Corridor, 800m from Brentwood Crossrail station, with good accessibility to key services and facilities as well as the strategic road network, train links to London and other public transport. Several primary and secondary schools are within a reasonable distance and the characteristics of the site, with softly undulating land and an abundance of trees and hedgerows in the setting of the Water Tower heritage asset, offer a unique opportunity for high-quality, aesthetically pleasing homes.
- 4.5 As vacant previously developed, surplus public-sector land, the site represents an excellent opportunity to deliver homes on brownfield land in line with policy direction in the NPPF and would make best use of land currently costing the NHS money in maintenance and upkeep.
- 4.6 We therefore support BBC in allocating the Site for residential development.
- 4.7 Taking account of the above, we would seek to support BBC in its defence of Policy R09 at Examination and we therefore consider it appropriate to participate at the oral part of the Examination in Public to enable discussion of the points we have raised.

APPENDIX 1

SITE LOCATION PLAN

Surplus NHS land at Warley Hill, Brentwood



Ordnance Survey © Crown Copyright 2012. All rights reserved.
Licence number 100020449. Plotted Scale - 1:2500



Drawing Number: A.42,963
Scale: 1:2500 @A4
O.S. Ref: TQ5892SE
Date: 18/10/2012



t: 01245 250998
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APPENDIX 2

COMPLETED COMMENTS FORM



Brentwood Pre-Submission Local Plan (Regulation 19)

January 2019

COMMENT FORM

From Tuesday 05 February to Tuesday 19 March 2019 we are consulting on the next stage of the Brentwood Local Plan: Pre-Submission Local Plan (Regulation 19). 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 5PM Tuesday 19 March 2019.

Please return forms either by attaching completed forms by email to **planning.policy@brentwood.gov.uk** or alternatively by post to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY.

How to complete the representation form:

This form consists of two sections – Section A: Personal Information, and Section B: Your Representation. Please note that your representation cannot be accepted without completing information identified in Section A.

The Local Plan Pre-Submission (Regulation 19) consultation consists of more formal and technical questions focused on the four Tests of Soundness and whether the Local Plan is compliant with relevant legislation. Comments are to be focused on three core areas – is the Plan positively prepared (referred to as ‘soundness’), does the Council adhere to the Duty to Cooperate, and is the Plan legally compliant (addressed by question 3 of this comment form). These terms are defined below:

- a) **Soundness:** Local Planning Authorities must prepare a Local Plan based on relevant and appropriate evidence base. They are required to publish these documents on their website. The evidence used to develop the Brentwood Local Plan can be found on the Council’s website under Evidence Base.
- b) **Duty to Cooperate:** Throughout the plan-making process discussions have taken place with various statutory consultees and neighbouring authorities. A summary of these meetings can be found within the Duty to Cooperate Statement, published as part of the Regulation 19 consultation. This is a live

document and will be updated prior to being submitted to the Secretary of State.

- c) **Legally Compliant:** Local Planning Authorities must prepare a Local Plan which adheres to the requirements as set out in the National Planning Policy Framework (NPPF), planning practice guidance, and other relevant planning regulations & legislation.

Question 4 of this comment form asks for further information on your opinion of the Plans 'soundness'. According to the National Planning Policy Framework (NPPF) para 35, Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

Please keep in mind the information provided above to assist with correctly completing your comment form. For additional information on what the difference is between a Regulation 18 and Regulation 19 Local Plan consultation, please view the FAQ's published on-line www.brentwood.gov.uk/localplan

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 the above conditions.

Section A: Personal Details

Title	Mr
First Name	Steven
Last Name	Butler
Job Title (if applicable)	Associate, Planning
Organisation (if applicable)	Bidwells
Address	Bidwell House Trumpington Road Cambridge
Post Code	CB2 9LD
Telephone Number	07769 687142
Email Address	Steven.butler@bidwells.co.uk

Section B: Your Representation

Please complete a separate sheet for each representation that you wish to make. You must complete 'Part A – Personal Details' for your representation to be accepted.

Representations cannot be treated as confidential and will be published on our Consultation Portal. Any representations that are considered libelous, racist, abusive or offensive will not be accepted. All representations made will only be attributed to your name. We will not publish any contact details, signatures or other sensitive information.

Full Name	Steven Butler (Bidwells) on behalf of the Essex Partnership University NHS Foundation Trust
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

Sustainability Appraisal

Habitat Regulations Assessment

Question 2: Please indicate which section of the indicated document identified above that you are commenting on (where applicable please clearly state the section / heading or paragraph number).

Please refer to our accompanying representations report. The report is accompanied by an Urban Design Strategy for the Policy R09 Site allocation, prepared by Bidwells' Urban Design Studio.

Question 3: Do you consider the Local Plan is:

Sound?

YES

NO

Legally Compliant?

YES

NO

Compliant with the Duty to Cooperate?

YES

NO

Question 4: If you consider the Local Plan unsound, please indicate your reasons below (please tick all that apply):

The Local Plan has not been positively prepared

The Local Plan is not justified

The Local Plan is not effective

The Local Plan is not consistent with national planning policy

Question 5: Please provide details of either:

- Why you consider the Plan to be sound, legally compliant, or adheres to the Duty to Cooperate; or
- Why you consider that the Local Plan is unsound, is not legally compliant, or fails to comply with the Duty to Cooperate

Please refer to our accompanying representations report.

Please continue on a separate sheet if necessary

Question 6: Please set out what modification(s) you consider necessary to make the Local Plan sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this modification will make the Local Plan sound or legally compliant. Please be as accurate as possible.

Please continue on a separate sheet if necessary

Question 7: If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the Examination in Public (EiP)?

NO, I do not wish to participate in the oral part of the EiP

YES, I wish to participate in the oral part of the EiP

Question 8: If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

As my client owns the site subject to draft policy allocation R09, we consider that it would be beneficial for us to attend the oral part of the Examination to enable discussion of the points we raise and to help justify the Council's approach.

Please continue on a separate sheet if necessary.

Please note that the Inspector (not the Council) will determine the most appropriate procedure to hear those who have indicated that they wish to participate in the oral part of the Examination.

APPENDIX 3

URBAN DESIGN STRATEGY



BIDWELLS