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Brentwood Borough Council
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By post and email: planning.policy@brentwood.gov.uk

19th March 2019
Ref. HGHL1109

Dear Sir / Madam

Re: Brentwood Local Plan: Pre-Submission Document (Regulation 19)

These representations have been submitted on behalf of Clearview Residential & Lardpam Ltd. in response to consultation on the Brentwood Local Plan: Pre-Submission Document (February 2019). They should be read in conjunction with our previous representations – including the Development Framework Document for St. Faith's, London Road (LPA ref. 299).

St Faith's, London Road

Despite being discounted by the Council at Regulation 18, Clearview & Lardpam remain committed to the site's development for a high-quality residential-led scheme capable of supporting:

- + Enhanced green spaces for sport and recreation with improved connections to surrounding infrastructure;
- + Approximately 750 new and deliverable homes (including 35% affordable) to meet demonstrable needs;
- + Integration of the existing office building for BT and/or other businesses; and
- + An element of local needs retail and leisure facilities to serve both new and existing communities.

As stipulated in previous representations, St. Faith's provides a strategic development opportunity for the Council – and the South Essex sub-region – offering a logical and sustainable location for an urban extension to Brentwood:

- + It is demonstrably deliverable with no major physical or legal constraints to development;
- + It comprises part previously developed land and is located close to Brentwood Town Centre and Railway Station – providing Crossrail services;
- + It performs poorly against the five purposes of the Green Belt and is a well contained site – the removal of which would represent only a 0.1% reduction in Brentwood's Green Belt; and
- + Only 25% of the land would have a built footprint, with the remaining land operating as enhanced open and green spaces.

It therefore remains Clearview & Lardpam's position that the site be released from the Green Belt and allocated for residential-led development in the emerging development plan.

South Essex Joint Strategic Plan

The South Essex authorities of Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea and Thurrock, together with Essex County Council, have agreed to prepare a new Joint Strategic Plan to ensure that future

opportunities for sustainable economic growth are maximised:

“By 2050, the ambition is that all new development will be located in the most sustainable locations, will be of the highest quality, will support the emerging local industrial strategy priorities, and will be well-connected by a fully integrated transport system and framework of green spaces. The current estimated need for housing across South Essex is 90,000 dwellings over the next 20 years, but with the right conditions to support growth, more could be achieved ...”¹

The combined authorities have set an ambitious timetable for preparing the Joint Strategic Plan, with adoption targeted for Autumn 2020. Ultimately, this will provide the strategic planning framework for South Essex with each authority then able to provide detailed local plans to help guide its delivery. In the interim, there is a commitment from all combined authorities to meet the full housing needs of the sub-region, with sufficient allocations to be determined through the Joint Strategic Plan. Identifying suitable sites will require ongoing engagement with key stakeholders, including landowners and developers such as Clearview & Lardpam.

Whilst Brentwood Borough Council will continue to prepare its own Local Plan, it has committed to support the Joint Strategic Plan as it progresses. This means that Brentwood will likely require an early review of its Local Plan to ensure consistency with the Joint Structure Plan – including identification of additional sites to help meet the economic ambitions of the sub-region. St. Faith’s provides a strategic development opportunity within the Crossrail / A12 corridor – one of five “Strategic Areas of Opportunity” identified in the South Essex Joint Strategic Plan: Statement of Common Ground (June 2018) – that should be identified to support sustainable economic growth in the sub-region.

Safeguarded Land

In this context, it is considered that – as a minimum – St. Faith’s should be identified as “safeguarded land” in the Brentwood Local Plan to help ensure that a sufficient quantum of land is identified to meet future development needs. This would accord with NPPF2 which states at paragraph 139:

“When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

Designation of St. Faith’s as “safeguarded land” satisfies all of these criteria as follows:

- + It is a logical and sustainable extension to Brentwood, as recognised in the Council’s Sustainability Appraisal (January 2019);

¹ South Essex Joint Strategic Plan: Statement of Common Ground (June 2018) – paragraph 5.3

- + Large areas of public open space and important ecological habitats can be retained and enhanced;
- + It provides a limited contribution to the Green Belt, as recognised in the Council's Green Belt Study (November 2018);
- + It can deliver a minimum of 750 new homes, employment and recreational opportunities to meet longer-term development needs (to be established through the Joint Strategic Plan and subsequent Brentwood Local Plan review);
- + It helps to ensure that Green Belt boundaries do not need to be altered at the end of the plan period; and
- + There are clear physical and defensible boundaries that define the site.

Given the likely need for additional housing to support sustainable economic growth in the sub-region, coupled with the historically constrained nature of Brentwood due to the Green Belt, it is considered "necessary" to identify sufficient "safeguarded land" to meet longer-term development needs and ensure that Green Belt boundaries will not need to be altered at the end of the plan period. This is a requirement of NPPF2 and until sufficient land is identified, the Brentwood Local Plan cannot be considered "sound" within the terms of NPPF2 paragraph 35.

We trust that these representations will be taken into account when preparing the Local Plan for submission to the Secretary of State for Independent Examination. Clearview & Lardpam welcomes the opportunity to continue working positively with Officers at Brentwood Borough Council to ensure that the Local Plan can be adopted at the earliest opportunity.

Should you require anything further, please do not hesitate to contact hgh Consulting.

Yours faithfully

Matthew Robinson

Associate

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Enc. St. Faith's – Masterplan