

to:

**Brentwood Borough Council
Local Development Plan Team
Town Hall
BRENTWOOD
Essex CM15 8AY**

Dear Sir/Madam,

**Please find enclosed the response of the Brentwood Branch of
CPRE (Campaign for the Protection of Rural England) to the Councils'
LDP Preferred Options Consultation.**

I would be grateful for acknowledgement of receipt of this document.

Yours faithfully,

**Robert Flunder
Chair, CPRE Brentwood Branch**

Brentwood Local Plan (2015-2030) - Preferred Options Consultation

CPRE Brentwood Branch Response – 16/09/2013

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. At the time of submission a number of LDP supporting documents had not been published, including the *Objectively Assessed Needs* document, and the Policy Maps. We therefore request the opportunity to be able to make further submissions at the Pre-Submission consultation stage if need be.

Our Brentwood CPRE group, as a matter of principle are opposed to the proposal for the building of 1000 homes in the green belt and we 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 significantly effective population growth rate reduction policies up to the LDP publication, this being a prime driving factor in the need for increased homes building. We feel Brentwood Council have done their best working to the current NPPF framework, to minimise the damaging effects for Brentwood of these present NPPF planning policies.

Housing Target Figure and Objectively Assessed Needs

Brentwood *Objectively Assessed Needs* calculation results in figures of 4960- 5600 needed homes, however, as permitted by the NPPF, the Council have opted for a lower target figure of 3500, believing the higher figures would result in unmitigated damage to the general environment of the authority, and unacceptable traffic generation within Brentwood town centre, and we agree with the statement on page 13 para 2.20 of the LDP explaining it is not possible to accommodate the scale of growth implied by the result of the Objectively Assessed Needs calculation within the context of a coherent spatial strategy with NPPF sustainable principles.

We also support the Council on the basis of the evidence given on page 17 para 32 stating evidence suggests higher level of growth (as implied in the *Objectively Assessed Needs* calculation) would significantly worsen traffic congestion, require sites to be developed in Landscape sensitive locations, and have a generally urbanising effect. Our group believe this Council action is wholly justified and we support this decision.

However we feel that there is another population growth 'easing factor' which supports the move to the lower target of 3500, and to reducing the rate of population growth figures in future, and that is the stated government intention to reduce Net Migration from 100s of thousands to 10s of thousands.

An ONS report attributed the actual increase in total UK population of 0.42 million for the 12 months ending June 2012 as due to Natural Change/Net Migration in proportions 60% - 40% showing a downward change for the Net Migration contribution at that time.

The same ONS report for this period ending June 2012 shows Net Migration of 168,000, with a UK total inward International Migration of 515,000, but though the great majority of these settled in London, 51,000 existing residents left London in the same period to settle in other UK regions, 40% settling in the South East or the Eastern Region.

So it can be seen here in the East there is also felt a significant indirect effect with inward International Migration to London being accompanied by sizeable outward migrations from London by those previously settled there.

To the extent that Brentwood receives some of the consequential outward migration from London, we believe it is reasonable to assume that in view of stated government policy this factor will be eased.

Spatial Strategy

During the earlier public consultation our group responded that Option 1 (centralised growth) was our first preferred option, with Option 2 (transport led growth) as our second choice, believing these offered the best option to minimise the quantity of green belt development that might otherwise be deemed necessary.

We are therefore in favour of the combination of Options 1 and Option 2 the Council have chosen as their favoured spatial strategy.

Nonetheless we note (page 14) even with the 'centralisation qualities' of Options 1 & 2, that there is still only sufficient suitable brownfield land in the vicinity of the urban centres of Brentwood and Shenfield to accommodate 51% of the housing provision requirement.

We believe that Option 3 (semi-dispersed growth in larger villages) and Option 4 (dispersed growth in all settlements) would likely lead to an additional increased development in the green belt, and some locations of potential new homes being far from transport links and unlikely to attract any additional necessary infrastructure. These would not represent sustainable locations.

Not being on green belt land and using brownfield former industrial land we have no objections to the use of sites (020) and (021) at West Horndon for siting 500 homes.

Green Belt Policy

We believe that in the event that insufficient suitable non-green belt land is available to meet the housing provision target, that Brentwood Council should only be required to approve housing development up to the point that it has sufficient suitable non-green belt land available to accommodate the development.

That is, Brentwood Council should be allowed to adjust its target of 3500 homes downward to the number of required new homes that does not need green belt development.

However this is clearly not government policy as expressed in the NPPF.

This means that Brentwood Council are being forced by government policy to approve home building in the green belt, and thus the issue reduces to "*Which part(s) of Brentwood green belt should be developed for this purpose ?*"

On which Part(s) of Green Belt should development occur

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

However in Brentwood's case such building is obviously going to happen, and so it is necessary to express an opinion on how the Council has selected the green belt site that it has for development.

Not all the green belt candidate sites are the same.

The LDP recommendation that West Horndon 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 this strategy, accepting the Councils 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

If building in the green belt is inevitable, then developments should be in sustainable locations with good existing transport links and infrastructure, and this is Brentwood Councils policy.

Chosen candidate site(s) need, amongst other things, good transport links and infrastructure (or the possibility of attracting housing developer funded/provided infrastructure).

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

As the LDP points out, West Horndon has good road and rail access, local shops, employment, and community facilities, in a way which no other development candidate sites possess.

With a commuter line rail station, good access to the A127, A128, and M25 (and thence to the national highways network), we believe West Horndon has far better transport capacity than any other potential candidate development sites.

Furthermore we agree that the West Horndon proposals have the greatest chance of attracting vital developer provided/funded essential infrastructure, compared to any other candidate site.

Our group believes none of the other alternative sites score so high on these critical criteria.

While we appreciate the unpopularity of these proposals for many West Horndon residents, we feel that it will not be possible for anyone to identify superior candidate site(s) as judged by the necessary criteria.

We believe the following requirements should be part of the definitive Local Plan for West Horndon irrespective of whether site (037) is approved for construction of 1000 homes :-.

To minimise the disruption to West Hordon 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 for sites referenced (020), (021), and, if approved site (037), construction traffic should only access the sites via Childerditch Lane or the A127.

It should be the case that Planning Approvals for West Horndon cannot be given without adequate provision of infrastructure.

Required infrastructure should include adequate drainage & drain systems, and an adequate fresh water supply.

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

- Adequate off-road parking
- Limitations placed on domestic hard surfacing
- Mandatory landscaping/trees
- Acknowledged good quality home designs
- Good sound and thermal insulation
- Good room sizes

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.

These sites are referred to as site 101B and site 101A in the LDP

Regarding site 101A – Land at former M25 works site, south of A127, our group are opposed to this proposed development.

A prime LDP justification for choosing this location is the fact that the LDP labels the site as 'Brownfield' land, but this is disingenuous. Prior to becoming an M25 widening works site most of this location was agricultural land, and a planning condition on its use by the Highways Agency was that on vacating the site it should be returned to its former condition. The fact that Brentwood Council have not pursued enforcement on this issue is not relevant; the majority of the site should be regarded as greenfield, greenbelt land.

Our group are opposed to the industrialisation of green belt open land around M25 junctions, believing the visual openness should be maintained as a positive factor mitigating the fact of motorway building in green belt.

This area is wholly visible from southbound M25 traffic crossing the A127 from above, and visible from northbound M25 traffic approaching junction 29 of that motorway,

We believe a preferable solution, rather than industrialise an otherwise largely virgin site (*which it would be if the government Highways Agency undertook the legally required site re-instatement*) is to re-develop and significantly expand the nearby Childerditch Industrial Park (1 mile eastwards on the A127), which although surrounded by green belt land is already in existence.

Regarding site 101B, as this is already in established use, and is physically grouped alongside existing farm building infrastructure, our group raise no objection to this use being formalised as an enterprise park, however we do have the following observation :-

Page 40 para 3.19 states .. " *The site is well screened from the south* ". We consider this statement is wrong.

The eastern most industrial plot of the pair that comprise site 101B has been used as a large lorry park.

Lorries can be easily seen in the winter from the west bound lane of the immediate A127, and can be seen at all times from houses in Warley Street to the north east of the site.

We believe this LDP paragraph should state that as a condition of the proposed development going forward, a scheme of permanently evergreen 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 mandatory and the species selected solely on their 'screening qualities'.

Brentwood Town Centre (Policy CP12)

Opportunities to enhance the public realm.

Discussion with Brentwood planning officers reveal 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.

Para 3.55 mentions turning 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.

Page 53 states "*this space should be used as the centre of the High Street, somewhere for people to enjoy spending time...*" while again ignoring the fact that this is precisely the function it very successfully performs at present.

However this same sentence finishes as so "*...while providing the key link from the High Street to both Baytree Centre and William Hunter Way*" thus we believe demonstrating the Council's further motivation for wishing to largely pave over this very attractive area and "open it up".

The Council thinking is demonstrated in figure 2.4, and in effect implies the Chapel Ruin Garden is an **'impediment'** to improved pedestrian links between William Hunter Way and the Baytree Centre.

This we believe is just wrong because 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 portraying the Chapel Ruins Garden as 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 inspection will demonstrate that these clearly are an actual physical impediment to improved pedestrian links between William Hunter Way to the north and the Baytree Centre to the south of the High Street.

We believe the Council case also depends on regarding the Chapel Ruins garden as "little used".

We believe this fundamentally misunderstands the case, as there are no seats provided within the garden.

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, thousands of passers-by every day.

And indeed it would be very easy to situate some public seating in this garden and thus establish a second type of use as a pleasing, green, town centre seating location .

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 100 are actually proposed at the Baytree centre.

We believe this 'town square' policy and the Council policy of locating another 100 homes in the Baytree Centre and many others in the town centre of Brentwood generally, are at variance with each other.

Policy CP13 Sustainable Transport

Page 60 para 3.60.

Our group are opposed to the proposed removal at Shenfield of Council owned car parks in Hunter Avenue and Friars Avenue Lane (for subsequent development with future housing of 14 homes at the first site and 12 at the second site - *ref. sites 130 and 129, Brentwood LDP 2015-30 Preferred Options-Supporting Document-Draft Site Assessment*).

This proposal would leave only British Rail Commuter car parks.

We believe that this action has the potential to undermine Shenfield shopping centre by deterring shoppers coming further than from walking distance and making it very hard for shop staff to find parking at a reasonable cost, if at all.

Presenting the public with a 10 minute walk when the weather can be excessively hot, excessively cold, or excessively rainy, or dark in winter, for a Council gain of development land close to Shenfield station, we believe, shows the Council has its priorities wrong on this matter.

The Council should develop its proposed 'Park & Walk' car park near Alexander Lane with housing if it is essential that these 26 homes are built.

Policy DM1: General Development Criteria

Page 75 after para H states *"In exceptional circumstances, where the Council considers the need for development outweighs any harm caused, the Council will require suitable compensatory measures, either on-site or off-site"*.

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.

Policy DM2 Effective Site Planning

Page 77 para d) states – *"safeguard the amenities of occupiers or any nearby properties by ensuring that their character and appearance is sensitive to the context and surroundings"*

We believe this policy should be modified to show that implementation of this policy should be safeguarded by planning applications having to explicitly demonstrate how compliance with this policy has been achieved.

Policy DM3: Residential Densities

Residential Densities in areas of Special Character:

We believe that if building is unavoidable in such areas it should be done at low building densities. Brentwood has a very high proportion of green belt land and areas of 'Special Landscape Area' status.

Current government policies lead to the view that in future, even should Brentwood Council seek a 'centralising development strategies' thus minimising 'green belt take', that nonetheless with each succeeding LDP period, Brentwood Council may well feel it necessary to advocate new housing development in the green belt.

In view of the fact that with this LDP (2015-2030) Brentwood Council feel that significant 'green belt take' is required, it is not unreasonable to assume that this process will be repeated in the future with each succeeding Brentwood LDP.

It therefore becomes entirely appropriate to have quantified 'Density Considerations' in place for special areas, as the Brentwood CPRE Group are proposing.

What must be avoided is, the possibly understandable, view of the Council, that when a green belt site is promoted for development (*what might be called 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'.

Given that Brentwood has so much green belt land, and relatively less non-green belt land compared to some other local authorities, we do not consider this is a proper basis for development land allocation, in terms of the possible harm to the environment if government policy leads to the inevitability of green belt land having to be sacrificed to housing development.

(Again we would re-iterate that if our Local Authority cannot meet the housing targets resulting from a process laid down by central government, and in which central government dictates major inputs to the requirement such as projected Population Growth and Projected Homes growth requirements', without green belt development, then the targets should be eased).

Page 79.

We believe the 2nd para beginning "*Residential densities will be expected...*" is insufficient in requirement and should explicitly state that where the surrounding area has special characteristics, e.g. high scenic value, or in or near a Special Landscape Area as designated in the current Local Plan, then residential densities will not exceed a specific density per hectare and could be significantly lower.

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

This is already council policy as shown in Brentwood LDP (2015-30) Preferred Options-Supporting Document-Draft Site Assessment, for sites :-

Site 016B (Woodlands School, Gt Warley) which is also shown as part of a Special Landscape Area and is assigned an indicative site density of 20 d.p.h),

Site 082 (Land fronting Warley St. Gt Warley) which is also shown as part of a Special Landscape Area and is assigned an indicative site density of 20 d.p.h),
&

Site 008B (Woodlands School, Hutton) *not part of a Special Landscape Area*, but a site of special character nonetheless, and is assigned an indicative site density of 11 d.p.h.

We do not understand why sites 016B and 082 in a Special Landscape Area in Great Warley are not assigned an indicative site density of 11 d.p.h as site 008B in Hutton (not in a Special Landscape Area) , and believe any dispersed green belt home building in or near Special Landscape Areas, require building densities of significantly less than 20 d.p.h in an attempt to mitigate the harm done to the character of the area.

The reason the above particular three sites are quoted is because they are the major semi-rural sites (totaling 257 dwellings) showing building densities per hectare of less than 30 indicated – they assist in illustrating the point we seek to make - *that there is an existing 'quantified' building density Council policy for such sites, and we believe this should be made public in a prominent way.*

The remaining 5 sites indicated in the Site Assessment document showing densities per hectare of less than 30 are very small plots totalling only 16 dwellings indicated all told.

However we must make clear our group is firmly opposed to any development at the above sites 016B, 082, and 008B, and support all the well justified reasons that the Council have brought forward for rejecting these sites and declaring them unsuitable locations for housing development. In short they are unsustainable locations.

Nonetheless we believe the Council policy demonstrated in indicated building densities in the Brentwood LDP (2015-30) Preferred Options-Supporting Document-Draft Site Assessment report should be very prominently shown in the main LDP document.

We would re-iterate our view that we believe there should be no housing building in Special Landscape Areas or other areas of great character and/or scenic quality, however if such building was ever contemplated because Brentwood Council felt compelled to approve such development, then this existing current Council policy should be prominently in place requiring very low building densities indeed in such sites, as a 'Policy Led' attempt to mitigate the potential harm.

We are opposed to such building but believe any building in Special Landscape Areas should not be at building densities greater than 11 d.p.h.- the Council chosen indicative figure for Woodlands School Hutton, itself not in a Special Landscape Area

In this regard we note the statement in para 2.32 on page 17 of the LDP where the Council state evidence suggesting the higher level of growth (as implied in the *Objectively Assessed Needs* calculation) would significantly worsen traffic congestion, ... "require sites to be developed in Landscape sensitive locations" .., and have a generally urbanising effect.

Policy DM15Agricultural Workers (or horticultural or forestry workers) Dwellings

We believe para 1 is too vague, and in addition does not exhibit the necessity for 'Business Viability' to be publicly demonstrated in planning application for new homes under this provision.

We believe para 1 should state that where a new home is proposed, a Business Plan should be submitted to the Council as a part of the planning application, and be available for public scrutiny.

It should be stated explicitly that such a Business Plan cannot be withheld from public scrutiny for any reason, including 'business confidentiality'.

The viability of the Business Plan must be validated by the Council, and the viability proved publicly by the Council in an Planning Officer's Report before the Council can give Approval to the planning application.

It should also be made explicit that Business Plan non-viability is a valid objection reason in the public consultation of such applications.

Policy DM18: Landscape Protection and Woodland Management

Page 115 para 4.70

We support the statement “ *Where conservation is the primary objective, there will be a presumption in favour of native species* ”

However we believe that there should be a statement in brackets at this point that refers to the case when the primary objective is screening of industrial/commercial/ and housing sites, and that the wording should be along the lines :-

“Where screening of industrial/commercial/and housing sites is the primary purpose, then species may be chosen appropriate to that purpose and it is not mandatory that native species be selected).

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.

Policy DM23 Housing Land Allocations – Major Sites

Pages 128/9 List

The redevelopment of the site of the former Mascalls Hospital, Mascalls Lane, Great Warley is missing from this list (40 + houses applied for, although Council is seeking a greater number).

Policy DM31 Protection and Enhancement of OpenSpace, Community, Sport and Recreational Facilities.

Our CPRE group considers that in addition to policies 1) to 111) that are quoted, that it should be explicitly stated that any proposed development on existing school playing fields within built up areas are incompatible with Council policy, and in addition so is a school planning to relocate out of a non-green belt Brentwood area to a greenbelt Brentwood area and at the time or subsequently requiring green belt land to be converted to school playing fields.

Policy DM39: Changes of Use or New Buildings for Institutional Purposes.

It is not obvious from this section that ‘Institutional Use’ is inappropriate development’ for the green belt, and we believe it would be useful to confirm that fact at the beginning of this section.