
BRENTWOOD BOROUGH LOCAL PLAN 2015-2030: PREFERRED OPTIONS

RESPONSE TO PUBLIC CONSULTATION

ON BEHALF OF

CROUDACE STRATEGIC

OCTOBER 2013

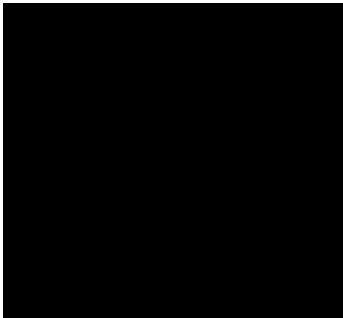
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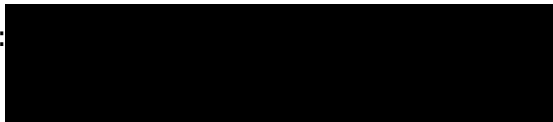
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CONTENTS

	Page No.
1.0 INTRODUCTION	1
(i) Purpose of These Representations	1
(ii) National Planning Policy Framework	1
(iii) Summary of Representations	2
2.0 POLICY S1: SPATIAL STRATEGY	4
(i) Policy Headlines	4
(ii) Strategic Housing Land Availability Assessment (October 2011)	4
(iii) Site Assessment Criteria in Policy S1	5
(iv) Conformity with NPPF	7
(v) Duty to Cooperate	8
(vi) Conclusions	8
3.0 POLICY S2 AMOUNT & DISTRIBUTION OF RESIDENTIAL DEVELOPMENT	10
(i) Amount and Spread of Development	10
(ii) Reasonable Alternatives	11
(iii) Growth Options	12
(iv) Lack of Robust Evidence	14
(v) Economic Role of Housing	14
(vi) Conclusions	16
4.0 OFFICERS MEADOW SHENFIELD	17
(i) Introduction	17
(ii) SHLAA (October 2011)	17
(iii) Development Proposals	18
(iv) NPPF Criteria	19
(v) Economic Role/Benefit of Scheme	20
(vi) Deliverability	21
(vii) Park and Walk Proposal	21
(viii) Access	22
5.0 REMAINING LOCAL PLAN POLICIES	23
(i) Policy S3: Job Growth and Employment Land	23
(ii) Policy CP3: Strategic Sites	23
(iii) Policy CP4: West Horndon Opportunity Area	24
(iv) Policy CP8: Housing Type & Mix	24
(v) Policy CP10: Green Belt	25
(vi) Policy CP11: Strong and Competitive Economy	26
(vii) Policy CP13: Sustainable Transport	26
(viii) Policy CP14: Sustainable Construction and Energy	27
(ix) Policy DM1: General Development Criteria	28
(x) Policy DM2: Effective Site Planning	28
(xi) Policy DM3: Residential Density	29
(xii) Policy DM11: New Development in the Green Belt	29
(xiii) Policy DM23: Housing Land Allocations: Major Sites	30
(xiv) Policy DM24: Affordable Housing	30
(xv) Policy DM29: Accessible, Adaptable Development	31
(xvi) Policy DM36: Sustainable Drainage	31
6.0 CONCLUSIONS	32

1.0 INTRODUCTION

(i) Purpose of These Representations

- 1.1 This Statement has been prepared on behalf of Croudace Strategic and sets out representations in response to Brentwood Borough Council's (BBC) Local Plan 2015-2030: Preferred Options consultation. Croudace Strategic has a controlling land interest in all of the site known as Officers Meadow, Chelmsford Road, Shenfield (SHLAA Ref G091).
- 1.2 Notwithstanding our Client's specific land interest, these representations have been prepared in objective terms and in the light of the prevailing planning policy framework – in particular the Government's guidance set out in the National Planning Policy Framework (NPPF) (March 2012).

(ii) National Planning Policy Framework

- 1.3 The NPPF now puts at the forefront of planning generally, a strong 'presumption in favour of sustainable development' (Para 14). It puts Local Authorities firmly on the front foot in encouraging and supporting sustainable growth and requires them to plan positively for new development and to be proactive in driving and supporting growth. Consequently, it is essential that BBC ensures that the sustainable development needed to support economic growth and to meet housing need in the Borough is delivered as effectively as possible, and that this approach is positively supported by the Local Plan.
- 1.4 The NPPF requires Local Authorities to use their evidence base to ensure that the 'full, objectively assessed needs' for market and affordable housing in the relevant housing market area are met (Para 47). LPAs must plan for a mix of housing that "*meets housing and population projections, taking account of migration and demographic change*" (Para 159). Significant weight should also be placed on the need to support economic growth through the planning system (Para 19).
- 1.5 LPAs also have a 'duty to co-operate' on housing issues crossing administrative boundaries, particularly strategic priorities, as defined in Para 156 and must demonstrate that they have done so at local plan Examinations (Paras 178 and 181).

1.6 Paragraph 182 of the NPPF refers to Examining Local Plans and states, "A local planning authority should submit a plan for examination which it considers is 'sound' – namely that is:

- **Positively prepared**- the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and is consistent with achieving sustainable development (our emphasis);
- **Justified**- the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; (our emphasis);
- **Effective**- the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; (our emphasis) and
- **Consistent with national policy**- the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. (our emphasis)

(iv) Summary of Representations

1.7 The following representations set out our Client's specific comments in respect of the Preferred Options consultation and the 'soundness' of the draft Local Plan's approach in relation to the requirements of the NPPF.

1.8 This Statement provides information on the following:

- Overview of the spatial strategy, housing numbers and 'soundness' of the Local Plan;
- Consideration of the amount and distribution of residential development and in particular the West Horndon proposal (as a geographical location) versus development in Brentwood/Shenfield;
- Representations on the Officers Meadow site in Shenfield with particular regard to access as well as the Council's proposed 'Park and Walk' facility/proposal; and
- Representations on remaining Core Policies and Development Management Policies within the Local Plan.

1.9 For ease of reference representations have been made in respect of the following policies and paragraphs contained in the Local Plan:

- Policy S1: Spatial Strategy
- Policy S2: Amount and Distribution of Residential Development 2015-2030
- Policy S3: Job Growth and Employment Land
- Policy CP3: Strategic Sites
- Policy CP4: West Horndon Opportunity Area
- Policy CP8: Housing Type and Mix
- Policy CP10: Green Belt
- Policy CP11: Strong and Competitive Economy
- Policy CP13: Sustainable Transport
- Policy CP14: Sustainable Construction and Energy
- Policy DM1: General Development Criteria
- Policy DM2: Effective Site Planning
- Policy DM3: Residential Density
- Policy DM11: New Development in the Green Belt
- Policy DM23: Housing Land Allocations: Major Sites
- Policy DM24: Affordable Housing
- Policy DM29: Accessible, Adaptable Development
- Policy DM36: Sustainable Drainage

2.0 POLICY S1: SPATIAL STRATEGY

(i) Policy Headlines

- 2.1 The Spatial Strategy for Brentwood Borough provides the context for managing change and shaping how the area develops in the future. The strategy sets out the level and location of development, highlights the key areas of change up to 2030 and provides the basis for delivering strategic objectives.
- 2.2 The overarching strategy is intended to apply to all development in the Borough. The Core and Development Management Policies in the Plan provide the framework for its delivery.
- 2.3 Policy S1 sets out the preferred spatial strategy for the Borough. The policy states:

The Council's preferred spatial strategy for the Borough aims to protect the Green Belt and local character and foster sustainable communities by focusing the majority of new development between 2015 and 2030 on land within accessible settlements. Brentwood, Shenfield and West Horndon will be the main focus for development along with the redevelopment of suitable developed sites in the Green Belt. Limited development, including infilling where appropriate, will take place in other villages at a level commensurate with services and facilities available and which maintains local amenity and distinctiveness.

- 2.4 The policy requires that all development sites are to be identified having regard to whether they are accessible to public transport, services and facilities; their impact on Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood risk, air and water pollution; and whether they are likely to come forward over the plan period.
- 2.5 The policy also states that other than the strategic allocation at West Horndon and minor changes to accommodate proposed development on existing developed sites in the Green Belt, no change to Green Belt boundaries is envisaged. As explained later in these Representations, we disagree with this approach.

(ii) Strategic Housing Land Availability Assessment (SHLAA) (October 2011)

- 2.6 The SHLAA (October 2011) concluded that given the over supply from completions during April 2001 to March 2010 and expected to come forward from sites with unimplemented planning consent, there is an adequate amount of available land to meet proposed housing requirements on brownfield sites for the first 9.9 years (2010-2019/20) of the Plan period.

However, during the second ten years (2020-2030), other than a reliance on Windfall sites, there would be a minimal amount of brownfield land (89 dwellings) available to deliver the required housing supply. There would however be sufficient land available to meet the remaining requirement on Greenfield sites. Greenfield land would therefore need to be released during this period.

- 2.7 In terms of recommendations, the SHLAA (October 2011) states that the potential Greenfield releases which are likely to be required should be identified through a detailed assessment of potential sites in the Site Allocations DPD (it is no longer BBC's intention to produce a separate Site Allocations DPD). It was also recognised that whilst the SHLAA represents a 'snapshot in time', in terms of the housing land availability position in the Borough, some sites that had been discounted may become available for development. The SHLAA therefore requires updating on a regular basis (*"it is considered appropriate to update the SHLAA on an annual basis for at least the next two years"*). This recommendation has clearly not been followed and the SHLAA has not been updated since its publication in 2011.
- 2.8 The focus on Brentwood and Shenfield for future development is the most appropriate strategy, given the size of the settlements and the existing facilities and services which exist in both centres. However, it is evident in the draft Local Plan that there are no (our emphasis) major sites identified in Shenfield, despite the availability of a highly sustainable site at Officers Meadow which was included in the SHLAA (ref. G091) as a potential Greenfield site. The Officers Meadow site is a 20.4 ha site with capacity to accommodate in the region of 500 dwellings, together with generous public open space.
- 2.9 Officers Meadow is one of only two Greenfield Sites assessed and deemed to have potential for residential development' in Shenfield within the SHLAA. The other Greenfield site in Shenfield assessed to have potential is site ref G143 Land Adjacent to 110 Priests Lane which only has capacity for an infill development of one dwelling.

(iii) Site Assessment Criteria in Policy S1

- 2.10 Policy S1 sets out the criteria which sites are required to meet including whether they:
- Are accessible to public transport, services and facilities;
 - 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;
 - Are likely to come forward over the plan period.

- 2.11 We agree with the site selection criteria put forward in Policy S1. With regard to Officers Meadow, as set out in the SHLAA (October 2011), this site is suitable for development as it is located in a sustainable location, close to the Shenfield shopping area and rail station. It is well contained by existing vegetation and ribbon development fronting Chelmsford Road, with the railway line and woodland forming a barrier to the east. Shenfield High School and associated playing fields lie immediately to the south, so there is little scope for development at Officers Meadow to lead to further encroachment into the countryside. The site is also located on a bus route which provides direct access to the town centre. The site has been promoted by Croudace Strategic for many years. Throughout the Local Plan preparation process a number of technical studies have been carried out to demonstrate that development is deliverable and that any adverse impacts can be minimised. The site is currently available and can come forward for development in the immediate future, thus offering an excellent opportunity to contribute to the requirement to deliver much needed new housing.
- 2.12 Given that the SHLAA recognises that the required housing supply in the Borough over the Plan period cannot be met on brownfield sites and that Greenfield land will need to be released and taking account of the preferred spatial strategy to focus mainly on Brentwood and Shenfield for new development, there is a compelling case for Officers Meadow to be included as a major site allocation for residential development in the Local Plan.
- 2.13 The final section of Policy S1 refers to Green Belt boundaries and states that:

Other than that required to accommodate a strategic allocation at West Horndon and minor changes to accommodate proposed development on existing developed sites in the Green Belt, no change to Green Belt boundaries is envisaged.

- 2.14 We strongly disagree with this approach for a number of reasons. Four alternative spatial options were considered by BBC at the Issues and Options stage in 2009 and were the subject of public consultation. The four options were as follows:
1. Centralise Growth in and around Brentwood
 2. Transport Led Growth
 3. Semi-Dispersed Growth (larger villages)
 4. Dispersed growth (all settlements)

- 2.15 Options 3 and 4 above were rejected due to infrastructure constraints to delivering sustainable development. Particular concerns related to lack of sewerage treatment capacity to the north of the Borough, limited public transport to serve development, poor access to services, and landscape sensitivity issues. It is noted that West Horndon is one of the larger villages put forward under the rejected Option 3.
- 2.16 The Council's preferred option appears to be a combination of Alternative Options 1 and 2. A large proportion of new development is expected to take place in Brentwood, but there are limits as to how much development the town could accommodate. It is therefore necessary to consider more than one strategic location for development. Alternative Option 2 put forward transport led growth, with development at settlements with a rail station (i.e. Brentwood, Shenfield, Ingatestone and West Horndon). The Local Plan states that growth is planned for all places with a rail station, apart from Ingatestone which is excluded due to infrastructure constraints and a lack of suitable sites.
- 2.17 We support the Council's preferred approach as far as it relates to focusing growth on Brentwood and Shenfield. However we are perplexed by the absence of any strategic sites being put forward at Shenfield. We are equally bemused by the decision to include West Horndon as a strategic location. Whereas Brentwood and Shenfield are sustainable locations for growth, given their excellent transport links, access to jobs and services and town centre facilities. West Horndon conversely requires "*significant improvements to infrastructure and services*" (para 2.4 of the Local Plan). In terms of the settlement hierarchy set out in the background to Policy S1, Brentwood and Shenfield fall within Settlement Category 1 Main Town and are recognised as offering "*the most scope to develop in accordance with sustainable development principles*" (para 2.13 of the Local Plan). West Horndon by contrast falls within Settlement Category 3 Larger Villages, served by a railway station, local shopping parade, primary school, limited community and health facilities and a variable bus service. Whilst development on existing previously developed sites/redundant industrial land in West Horndon could be delivered in the short term, the infrastructure constraints associated with this village cannot support extensive sustainable development and we are not convinced that the necessary substantial infrastructure improvements will come forward during the Plan period.

(iv) Conformity with NPPF

- 2.18 As set out in Section 1 of this report, the NPPF (Para 47) specifically refers to the need for LPAs to meet 'full, objectively assessed needs', "*unless any impacts would significantly and demonstrably outweigh the benefits, when assessed against policies in this Framework taken as a whole*" (Para 14). Para 2.20 of the Local Plan states that the Council has carried out a

technical exercise to objectively assess development needs, and the preferred spatial strategy seeks to accommodate a '*significant proportion of this need*'. Para 2.20 goes on to state that "*due to significant capacity constraints, however, it is not possible to accommodate fully the scale of growth implied within the context of a coherent spatial strategy in accordance with sustainable development principles set out in the NPPF*". By implication, BBC must be looking to neighbouring authorities to meet its unmet need through a 'Duty to Cooperate'. According to para 2.21 of the Local Plan, the Council "*is exploring options in this regard*".

(v) Duty to Cooperate

- 2.19 To comply with the NPPF, BBC has a 'Duty to Cooperate', both in terms of meeting its own housing need and potentially to help in meeting the needs of adjoining districts. As matters stand it is unclear what the Council is actually doing in terms of "*exploring options*" with adjoining districts as there is no evidence available to demonstrate that BBC has effectively cooperated to plan for issues with cross-boundary impacts (NPPF Para 181).
- 2.20 Given that neighbouring authorities are relying on housing to be delivered beyond their boundaries, it is unlikely that BBC's unmet housing needs will be able to be accommodated sustainably elsewhere. No definitive solution to the identified shortfall in future housing provision has been put forward.

(vi) Conclusions

- 2.21 It is considered that there are significant shortcomings in BBC's Local Plan, relating to soundness, that the Council should address prior to Submission.
- 2.22 On the evidence currently available the Local Plan is considered 'unsound' on the grounds that:
- Currently, the housing target seeks a reduction on the hitherto objectively assessed need due to an imbalance of weight placed on environmental factors to the detriment of economic and social objectives;
 - In weighing up these considerations, it is important to remember that Green Belt is a policy-tool designation, and is not a specific 'environmental constraint';
 - There are insufficient strategic sites being put forward in Shenfield and Brentwood to support the Council's preferred approach of focusing development on these two settlements. Additionally there are significant question marks over the suitability of West Horndon as a strategic location and its deliverability at the scale envisaged.

- BBC has not yet made available the background evidence upon which the above 'harmful' impacts are founded. It is therefore impossible to provide informed comment upon such fundamental matters which might determine whether or not the Local Plan can be found sound. BBC must demonstrate and justify that:
 - a) it would not be reasonable to meet the full housing need; and
 - b) to do so would not be consistent with achieving sustainable development (as defined in the NPPF, with particular reference to the economic and social objectives as well as the environment).

- 2.23 Based on the above, it is not considered that the Local Plan is 'justified', 'consistent with national policy', nor does it appear to have been 'positively prepared'- the three key tests of Soundness. The current iteration of the Local Plan is therefore deemed to be 'unsound'.
- 2.24 The risk of submitting the Local Plan in its current form is perhaps best reflected in other recent Core Strategy/Local Plan Examinations (notably East Hampshire, Rother District, Dacorum, Waverley and Hart).
- 2.25 BBC should revisit the SHMA in order to identify the full objectively assessed need. Having then identified the full need, the Council should undertake an up-to date SHLAA in order to establish whether or not the full need can be met, having regard to the NPPF's objective to boost significantly the supply of housing.
- 2.26 If, following completion of the above studies the evidence suggests that the housing target should remain as proposed, the target should be described as a minimum (rather than an achievable maximum) and should not be treated as a ceiling to development covering the Plan period.

3.0 POLICY S2: AMOUNT & DISTRIBUTION OF RESIDENTIAL DEVELOPMENT

(i) Amount and Spread of Development

3.1 The settlement hierarchy for the Borough is set out as follows:

- Settlement Category 1: Main Town - Brentwood and Shenfield Urban Area
- Settlement Category 2: Village Service Centres – Ingatestone
- Settlement Category 3: Larger Villages - West Horndon, Blackmore, Doddinghurst, Herongate, Ingrave, Kelvedon Hatch and Mountnessing.
- Settlement Category 4: Smaller Villages – South Weald, Great Warley and Hook End.

3.2 It is recognised that within Settlement Category 1, "*Brentwood and Shenfield offer the most scope to development in accordance with sustainable development principles*".

3.3 Policy S2 of the Local Plan sets out Brentwood's locations for residential development as follows:

- Brentwood and Shenfield Urban Area
- West Horndon
- Villages Excluded from the Green Belt (other than West Horndon)
- Villages in the Green Belt

3.4 Provision is made for 3,500 new dwellings (net) to be built in the Borough between March 2015 and March 2030 at an annual average rate of 200 new dwellings during 2015-2020, rising to 250 new dwellings during 2020-2030.

3.5 The Local Plan proposes the following distribution of development (including strategic allocations):

- Brentwood & Shenfield Urban Area - **1,800 dwellings (51% of the requirement)**;
- West Horndon - **1,500 dwellings (43% of the requirement)**;
- Villages Excluded from the Green Belt – **200 dwellings (6% of the requirement)**;
- Villages in the Green Belt – **0-15 dwellings (0-1% of the requirement)**.

3.6 The proposed distribution of development seeks the delivery of almost an equivalent number of dwellings (43%) at a Category 3 Settlement (West Horndon) as it does at the higher Tier 1 Main Town (51%).

3.7 Whilst the proposed distribution of development at the Category 1 Settlement (Brentwood and Shenfield) is supported in principle, it is considered that the proposal to locate 1,500 dwellings at West Horndon is in direct conflict with the settlement hierarchy and represents a failure to properly plan for and support development in higher ranking settlements.

3.8 It is considered that the current approach is not justified, effective or consistent with National policy, as the proposed distribution of 1,500 dwellings to West Horndon:

- Does not provide the most appropriate strategy when assessed against reasonable alternatives;
- Does not support the Local Plan Spatial Strategy;
- Has not been informed by a robust evidence base, including the SHLAA (2011) and SHMA (2010); and
- The robust evidence base is incomplete with several key documents unavailable to view during the consultation period (including the Objectively Assessed Needs Assessment, Landscape Sensitivity and Green Belt Assessment, Transport Modelling work and SHMA Update).

3.9 The above issues are explored further below.

(ii) Reasonable Alternatives

3.10 The spatial strategy options that are presented in the Local Plan Preferred Options document are as follows:

- 1. Focus development primarily at Brentwood, Shenfield and West Horndon
- 2. Centralise growth in and around the town of Brentwood
- 3. Transport led growth – develop at settlements with a rail station i.e. Brentwood, Shenfield, Ingatestone and West Horndon
- 4. Semi-dispersed growth (larger villages)
- 5. Dispersed growth (all settlements)

3.11 Options 2, 3, 4 and 5 above were consulted on as part of the Core Strategy Issues and Options consultation. The Brentwood Sustainability Appraisal at the Core Strategy Issues and Options stage concluded that a combination of transport led growth and semi-dispersed growth would provide the greatest sustainability benefits for the Borough.

- 3.12 However, as set out in para 2.17 of the Local Plan, *"this conclusion was reached prior to technical work carried out since which sheds further light on opportunities and constraints"*. This technical work has affected the preferred approach to growth, which is now Option 1 above (focusing on Brentwood, Shenfield and West Horndon). Whilst we support the focus on Brentwood and Shenfield and we agree with the Council that these two settlements offer the most scope for development in accordance with sustainable development principles, we strongly question the inclusion of West Horndon and the justification for using a lower tier settlement to deliver substantial growth. We are also extremely concerned about the lack of an available evidence base (which is largely 'forthcoming' and currently not available for public scrutiny). Accordingly it is considered that the current consultation exercise cannot generate properly informed responses. This is a critical flaw in the Local Plan process.
- 3.13 Given that West Horndon, as a larger village, offers very little by way of services and facilities in comparison to the main town of Brentwood and Shenfield, it is not considered justified to seek to distribute such a significant proportion of development (almost one half of the district's future housing provision) to that peripheral location.
- 3.14 Furthermore the proposed West Horndon allocation will not make best use of existing infrastructure, indeed it is recognised that *"significant improvements to infrastructure and services would be required to support growth at West Horndon"*. By contrast, Shenfield with a station at the eastern end of the Crossrail line and a wide range of shops, services and facilities to support future growth as recognised throughout the Local Plan already represents a better offer for inward investment. Para 2.3 in particular states that *"Brentwood and Shenfield are considered sustainable locations for growth, given excellent transport links, access to jobs and services and town centre facilities"*. The Council's policies support growth in Shenfield and yet there are no major allocations for residential development proposed at the settlement.
- 3.15 Whilst we agree with the general notion that the vitality and viability of rural communities should be supported, it is considered that the allocation of 1,500 dwellings at West Horndon goes far beyond reasonable expectations.

(iii) Growth Options

- 3.16 The Government expects Local Plans to meet full objectively assessed needs for market and affordable housing, with sufficient flexibility to adapt to rapid change unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits (NPPF, Para 14).

3.17 The residential development options referred to in the draft Local Plan are as follows:

- 2,625 dwellings (170 per annum on average) – the low growth option
- 3,500 dwellings (233 per annum on average) – the preferred option
- 5,600 dwellings (373 per annum on average) – the high growth option.

3.18 The low growth option is comparable to the former East of England Regional Plan target. This option has been rejected as it would not meet objectively assessed housing needs so it could not be justified in the light of national policy requirements.

3.19 The high growth option (5,600 dwellings) was derived from technical work (including a Housing Growth Scenarios Study (2012)) commissioned by BBC, Maldon DC and Chelmsford BC, and a study carried out by Peter Brett Associates (PBA) on behalf of the Council (2013 – forthcoming).

3.20 The Housing Growth Scenarios Study (2012) examined the implications of growth at different levels: population stable – 1,680 dwellings over the plan period (112 homes per year); workforce stable – 1,950 dwellings (125 homes per year) and ONS/CLG projections – 6,000 dwellings (400 homes per year). The third scenario was based on the Department for Community and Local Government and the Office for National Statistics (2010 based) population and household projections.

3.21 The PBA Study (2013) has not been made publicly available for scrutiny as part of this consultation process. Reference is however made to the PBA Study in the Council's Interim Sustainability Appraisal (SA) (August 2013) and it is understood that it concluded that a housing target of between 4,965 (331 per annum) and 5,430 (362 per annum) dwellings would represent the objectively assessed need for the Borough. This is in stark contrast to BBC's preferred target of 3,500 dwellings to be built in the period 2015-2030.

3.22 The objectively assessed need option represented the highest growth option considered by BBC and this has been rejected as the preferred approach due to concerns about Green Belt release, congestion in Brentwood Town Centre and impact on the rural character of the Borough. However, it is not possible to establish why BBC has concluded that this level of growth would "*worsen congestion*" or why "*significant infrastructure and services would be required to support this level of growth and there is no guarantee this would be forthcoming*", as the background studies (including the Traffic Modelling Study) are unavailable.

- 3.23 In our view, the Council has not satisfactorily explained why the objectively assessed need option has been rejected or why that option fits poorly with the Council's preferred spatial strategy and available alternatives. As the supporting evidence base has not been completed or made available in draft to the general public for the consultation, it is difficult to understand the rationale behind the Council's approach.
- 3.24 We emphasise that the Government expects Local Plans to meet full objectively assessed needs for market and affordable housing. The growth scenario being put forward as the preferred option in the draft Local Plan appears to fail to meet such needs by a significant margin (falling short by some 2,000 dwellings). There is currently no robust evidence available to suggest that the adverse impacts of meeting the objectively assessed needs would significantly and demonstrably outweigh the benefits.

(iv) Lack of Robust Evidence

- 3.25 As set out previously, BBC's SHLAA, which is based on the position as at October 2011, and BBC's SHMA (2010) are both out of date. Without an up to date evidence base it is not possible to comment constructively on many of the Council's chosen paths.
- 3.26 In essence, BBC is currently attempting to justify a reduced housing target for the Plan period based on environmental constraints. It is not considered that sufficient evidence has been put forward to justify such a strategy. It is nevertheless considered that such limitations are more likely to apply at rural locations, including West Horndon where BBC is currently proposing to allocate almost half of its future housing requirement.
- 3.27 Without access to a comprehensive evidence base it is not clear from the Preferred Options document precisely what factors have led the Council to conclude that an allocation of 1,500 dwellings at West Horndon, involving a significant release of Green Belt land, is justified.

(v) Economic Role of Housing

- 3.28 The NPPF (para 7) indicates that there are three dimensions to sustainable development, which give rise to the need for the planning system to perform a number of roles (i.e. 'economic', 'social' and 'environmental'). It is important to recognise that these roles cannot be considered in isolation because they are mutually dependent. Accordingly, in the absence of a comprehensive evidence base, it is difficult to undertake a meaningful evaluation of the detrimental effects to the local and regional economies that might arise from the low level of housing currently being proposed by BBC. When attempting to assess the underlying rationale supporting BBC's overall proposed spatial distribution of future development, it is

impossible to ascertain the true interrelationship between BBC's economic growth and job creation aspirations and the level of overall housing proposed.

3.29 The economic and social implications of failing to properly plan for the housing needs of an area are far reaching and significant, and include:

- increasing the number of households who do not have a home of their own to live in;
- pricing 'would-be' first time buyers out of the market;
- failing to meet the demands of newly forming households, who will be forced to move out of the Brentwood area;
- promoting unsustainable commuting patterns;
- reducing the competitiveness of local businesses; and
- eroding the vitality and viability of Brentwood and Shenfield centres.

3.30 To help meet the Borough's economic objectives, BBC should be planning positively for a significantly increased level of housing - to better reflect its objectively assessed needs - and to accommodate the workforce necessary to deliver its economic goals. This important interrelationship is now reflected in the recently published National Planning Practice Guidance (NPPG, August 2013), which introduces a direct correlation between the provision of new jobs, labour supply and the potential to increase housing supply to meet these objectives. Again, due to the currently inadequate evidence base, it is difficult to analyse this synergy fully, but the NPPG is very clear in seeking to provide clarity between job growth and that of the working age population:

Where the supply of working age population (labour force supply) is less than the projected job growth, this will result in unsustainable commuting patterns and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider increasing their housing numbers to address these problems.

[NPPG, ID 2a-019-130729]

3.31 At this stage, and from our best estimates of a 2,000 dwelling shortfall, we have calculated that this could result in a potential loss of economic output (GVA) to the Brentwood and surrounding sub-regional economy of circa £96M per annum.

(vi) Conclusions

- 3.32 It is considered that the strategy set out in the Local Plan Preferred Options document is not a sound strategy in the context of the tests of soundness set out in the NPPF. Notably:
- There is an inadequate evidence base (a key element of the “justified” test of soundness), to support the proposed allocation of 1,500 dwellings at West Horndon. It is therefore questionable whether this element of the spatial strategy is deliverable;
 - The preferred option does not represent the most appropriate strategy when considered against reasonable alternatives (a key element of the “justified” test of soundness).
- 3.33 It is considered that in order to provide a sound strategy in accordance with the “justified” and “effective” tests of soundness ‘consistent with national policy’, the 1,500 dwellings proposed at West Horndon should be redistributed to the higher tier settlements, Brentwood and Shenfield, in line with Policy S1.
- 3.34 The redistribution of dwellings suggested above should include development at Officers Meadow, Shenfield (SHLAA Ref. G091). As recognised in the Local Plan, Shenfield is a sustainable settlement, scoring highly in the Settlement Hierarchy and it is identified in the Local Plan as a very sustainable location for growth, due to the level of facilities and services it offers.
- 3.35 This is particularly important given that there are currently no major sites identified for development in Shenfield.
- 3.36 It is considered that a significant proportion of residential development should be allocated within or immediately adjacent to the settlement of Shenfield (notably Officers Meadow, Alexander Lane). Such an allocation at Shenfield would:
- Make a substantial contribution to meeting local housing need;
 - Secure an effective balanced supply of dwelling types and tenures
 - Ensure that the economic vitality of the settlement is maintained and enhanced.
- 3.37 The next section of this report focuses on Officers Meadow, Shenfield and demonstrates that the site is available, suitable, achievable and deliverable in the short term.

4.0 OFFICERS MEADOW, SHENFIELD

(i) Introduction

- 4.1 The site at Officers Meadow, Shenfield comprises a series of open fields located immediately to the north of Shenfield. Historically the site has been in agricultural use, but it is now mainly rough pasture/scrubland.
- 4.2 Although located within the Green Belt the site forms an enclave of open land framed for the most part by existing development and transport infrastructure. As a development opportunity which would have little environmental impact on the locality, the site benefits from effective physical and visual enclosure. It is well placed to accommodate future development by virtue of its sustainable position in close proximity to Shenfield. The site was put forward in response the SHLAA's 'Call for Sites' exercise in December 2009.

(ii) SHLAA (October 2011)

- 4.3 The SHLAA (October 2011) identifies land which is suitable, available and achievable for housing development in the Borough to meet housing targets to be set for the period 2010-2031. The document also aimed to give an insight into BBC's ability to meet proposed growth levels beyond the now extinct Regional Plan's timeframe and to form part of the evidence base supporting BBC's emerging Local Plan.
- 4.4 At the time of the 2011 Assessment, 26 Brownfield sites and 40 Greenfield sites were considered to have the potential to be developed for residential development during the period to 2031.
- 4.5 The key conclusion of the SHLAA is that over the Plan period there would be insufficient Brownfield sites available to meet housing needs. It became evident that Greenfield releases would be inescapable.
- 4.6 The SHLAA report also concluded that due to the economic climate and changes to national planning policy that the document should be updated on an annual basis, for at least the next two years. This has not happened and any SHLAA updates have not been made available prior to or during the consultation period on the Local Plan Preferred Options.
- 4.7 Officers Meadow, Shenfield, is identified in the SHLAA as a 'Potential Greenfield Site'. The site has been given the reference G091 with a site area of 20.4ha. With a medium density typology, the site is assessed as having a net dwelling capacity of some 500 dwellings.

4.8 SHLAA sites are considered to be 'developable' and 'deliverable' if assessed as being 'available', 'suitable' and 'achievable'. As set out in the SHLAA, Officers Meadow meets all these criteria:

- **Available- the site is available now.** There are no insurmountable site constraints or legal/ ownership issues which might prejudice development.
- **Suitable- the site is ideally located for accommodating a highly sustainable development.** For the most part it comprises unused scrubland and it is identified in the SHLAA as being located in a sustainable location, close to Shenfield shopping area and rail station. The site is located on a bus route which provides direct access to the town centre. It is enclosed by the Chelmsford Road, woodland and railway lines which place limits on further encroachment into the countryside.
- **Achievable- the site is deliverable in the next five years.** The site is not constrained by any landscape or environmental designations. As a greenfield site it is not constrained by existing development or activities.

(iii) Development Proposals

4.9 The site is being promoted by Croudace Strategic who have held pre-application meetings with Council Officers to consider appropriate development proposals.

4.10 A number of technical studies have been commissioned including:

- A Preliminary Landscape and Visual Appraisal
- A Phase I Preliminary Habitat Survey
- An Access Strategy
- A Preliminary Drainage Strategy
- An Archaeological Desk Based Assessment
- A Noise Level Survey

4.11 An illustrative masterplan has been prepared for the site, demonstrating how it could be developed and setting out the main design principles for access (vehicular and pedestrian), developable areas, open space and landscape strategy.

- 4.12 It is envisaged that the site would deliver in excess of 500 dwellings, offering a range of dwelling types and tenure. The density of development would vary across the site with higher densities in the central and southern parts of the site, and lower density on the northern part.
- 4.13 The proposed access would be from Chelmsford Road, potentially linking through to Alexander Lane.
- 4.14 An east/west green corridor across the site linking the existing public footpath on the eastern flank to Chelmsford Road would provide a multifunctional open space alongside the stream which separates the main part of the site from Shenfield High School playing fields. This green corridor could also accommodate surface water attenuation basins and provide opportunities for enhanced biodiversity and informal recreation.
- 4.15 Existing mature trees across the site would be retained and protected. The existing hedgerows and tree screening along the northern boundary would be reinforced to preserve the privacy of neighbouring residential properties fronting Chelmsford Road. A generous area of public open space incorporating woodland would be provided at the eastern end of the site providing a significant buffer to the railway.

(iv) NPPF Criteria

- 4.16 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking processes.
- 4.17 For plan-making, this means that:
- LPAs should positively seek opportunities to meet the development needs of their area;
 - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies in the Framework indicate development should be restricted.

- 4.18 As set out previously in these Representations, Policy S1 in the draft Local Plan sets out the preferred spatial strategy for the Borough which aims to protect the Green Belt and local character and to foster sustainable communities by focusing the majority of new development between 2015 and 2030 on land within accessible settlements. Brentwood, Shenfield and West Horndon will be the main focus for development along with the redevelopment of suitable developed sites in the Green Belt. Brentwood and Shenfield are considered sustainable locations for growth, given their excellent transport links, access to jobs and services and town centre facilities.
- 4.19 We support the proposed spatial strategy as far as it relates to focusing development in Brentwood and Shenfield, but we do not support the Council's preferred approach to also focus growth at West Horndon. That location is far less sustainable and deliverable in comparison to sites available in Brentwood and Shenfield. We are also very concerned that contrary to the apparent focus on Shenfield for growth, there is a distinct absence of any large development sites/ allocations in the draft Local Plan at that settlement.
- 4.20 We believe that Officers Meadow offers a prime opportunity for a highly sustainable development, close to the existing settlement of Shenfield. The development of this site for housing would support the Council's preferred strategy and deliver clear benefits to Shenfield.

(v) Economic Role/Benefit of Scheme

- 4.21 The NPPF sets out three dimensions to sustainable development, these being economic, social and environmental. Para 152 of the NPPF confirms that LPAs should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and deliver net gains across all three.
- 4.22 The NPPF confirms that pursuing sustainable development involves seeking positive improvements to people's quality of life including:
- Making it easier for jobs to be created in cities, towns and villages; and
 - Improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.
- 4.23 In its economic role, the planning system is required "*to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and by identifying and coordinating development requirements, including the provision of infrastructure*" (para 7, NPPF).

- 4.24 In its social role, the planning system is required to support "*strong, vibrant and healthy communities, by providing a supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being*";
- 4.25 In terms of its environmental role, the planning system needs to contribute "*to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution and mitigate and adapt to climate change*".
- 4.26 There are many potential economic, social and environmental benefits which could arise from development at Officers Meadow. These include:
- Provision of a wide range of much needed housing in a highly sustainable location;
 - Provision of generous areas of public open space;
 - Strengthening of Shenfield's vitality and viability;
 - Delivery of a significant number of affordable homes;
 - Contributions towards improved community facilities;
 - Making a substantial contribution to meeting the Borough's overall housing need on a well contained site , thereby protecting more sensitive and visual sites from development;
 - The creation of direct construction jobs plus additional indirect jobs;
 - New Homes Bonus payment (over 6 year period) of £2.6M generated by the scheme.

(vi) Deliverability

- 4.27 The SHLAA recognised Officers Meadow's highly sustainable credentials and its suitability for residential purposes. In our view there is nothing to prevent development of the site commencing at an early stage.

(vii) Park and Walk Proposals

- 4.28 Despite the site being identified in the SHLAA as a potential Greenfield development site, and notwithstanding the discussions which have taken place with Planning Officers over recent years, Officers Meadow has not been included in the draft Local Plan Major Sites Housing Land Allocations (Policy DM23 refers). Instead the draft Local Plan somewhat vaguely proposes that Officers Meadow might be used to provide a 'Park and Walk' facility in connection with changes associated with the redevelopment of nearby Shenfield Station.

- 4.29 The justification text for Policy CP13 Sustainable Transport refers to the arrival of Crossrail and the many benefits likely to be bestowed upon local residents and businesses. Accordingly the Council is looking to improve access and parking provision to Brentwood and Shenfield stations. Para. 3.60 states that the Council is seeking a suitable site to provide a 'Park and Walk' facility in Shenfield, "*potentially leaving existing car parks around Shenfield Station available for redevelopment*". Para.3.60 goes on to state that "*the most appropriate location for a Park and Ride site is to the north-east of Shenfield due to quick vehicle access to the A12 and approx 10 min walking time via Alexander Lane to Shenfield Station. However, Alexander Lane itself is not suitable for vehicles to access a site. Therefore, vehicle access from Chelmsford Road (A1023) may be required*".
- 4.30 The Council has not discussed the 'Park and Walk' proposal with either the landowners of Officers Meadow or Croudace Strategic. Consequently the full implications of the Council's aspirations remain something of a mystery. Whilst we agree that Officers Meadow constitutes a highly sustainable location for development, it would not be appropriate to develop the entire site as a car park. Such an outcome would be considered as a sadly missed opportunity in the context of meeting objectively assessed housing needs and identifying sustainable sites for residential development in Shenfield.

(viii) Access

- 4.31 A Technical Note has been prepared by Stuart Michael Associates (SMA) to advise Croudace Strategic of the potential quantum of development that could be considered for Officers Meadow.
- 4.32 Preliminary discussions have taken place with Essex County Council (ECC) Highways to review the concept Masterplan and to establish an appropriate access strategy for the site (for all modes of travel). At a meeting held on 27th February 2013, it was agreed that given the proposed scale of development (approximately 500 dwellings) a roundabout at Chelmsford Road (A1023) is the most realistic access option.
- 4.33 A full Transport Assessment (accompanied by a Travel Plan) would need to be prepared to accompany any future outline planning application.

5.0 REMAINING CORE STRATEGY POLICIES

(i) Policy S3: Job Growth and Employment Land

- 5.1 Policy S3 states that provision is made for 5,400 additional jobs to be provided in the Borough between March 2015 and March 2030 at an annual average rate of 285 to be distributed on existing employment sites and at new employment allocations. Providing for this many jobs will require a total of 31ha of new employment land.
- 5.2 Within the alternative growth options, reference is made to the Heart of Essex Economic Futures Study which sets out two scenarios for economic growth to 2031. The 'Dwelling Constrained' scenario projects job growth and the amount of employment land required assuming 170 homes are built per year in the Borough (former Regional Plan figure). BBC considered that that scenario would compromise the Borough's Green Belt, so it was rejected. Instead BBC has chosen to follow a Sector Derived scenario.
- 5.3 As set out in the NPPF, there is an interrelationship between job creation/aspiration and the proposed level of housing. The NPPF is clear in stating that local authorities should work closely with the business community to understand their changing needs and to identify and address barriers to investment including a lack of housing. The Government is convinced of the need to build more homes in order to facilitate local economic growth and to address affordable housing pressures. As set out in section 3 of these representations, we have calculated a significant loss of economic output (GVA) to the Brentwood and the surrounding sub-regional economy due to the estimated 2,000 dwelling shortfall.
- 5.4 Therefore given the NPPF requirement and considering the Heart of Essex Economic Futures Study, we maintain the view that the Council cannot use the Borough's Green Belt location as an excuse for not meeting the necessary land requirements. There are sites on the edge of the Borough's main settlements which can accommodate new homes and employment floorspace in order to facilitate local economic growth and address housing pressures whilst at the same time protecting the most valuable Green Belt land.

(ii) Policy CP3: Strategic Sites

- 5.5 This policy sets out the strategic sites that are proposed to be allocated in accordance with the spatial strategy. These include West Horndon, William Hunter Way, the Baytree Centre and Brentwood Enterprise Park.

- 5.6 Three out of four of the strategic sites identified in Policy CP3 are within Brentwood. We are very concerned that there are no strategic sites identified within Shenfield, despite the Council's preferred spatial strategy as set out in Policy S1 to focus the majority of new development in Brentwood, Shenfield and West Horndon. The lack of a strategic site in Shenfield undermines the overall spatial strategy for the Borough.
- 5.7 In our view, Officers Meadow is recognised as being in a sustainable location within easy walking distance of Shenfield and its station. This site, which has been promoted since the earliest stages of the Local Plan process, is the obvious choice for a strategic site in Shenfield. Therefore the site should be included within Policy CP3 in order to reflect Policy S1.

(iii) Policy CP4: West Horndon Opportunity Area

- 5.8 This policy sets out the Council's aspirations for West Horndon.
- 5.9 We have previously highlighted our concerns over the Council's intention to include West Horndon as a main focus for development. We maintain that the settlement, when seen in the context of its location and existing size, services and facilities, is not a sustainable location for extensive development.
- 5.10 Furthermore, we are concerned by the sheer enormity and expense associated with providing the necessary infrastructure required to improve the settlement's sustainability credentials and the deliverability of this infrastructure to enable development to come forward. The alternative option of centralising growth in and around Brentwood, together with transport led growth at Brentwood and Shenfield would be more sustainable and ultimately deliverable in terms of housing land supply.

(iv) Policy CP8: Housing Type and Mix

- 5.11 Policy CP11 refers to how the Council is seeking a mix of dwelling types, sizes and specialist accommodation to provide choice, respond to needs and contribute towards the creation of sustainable, balanced communities. The Council expects a proportion of new homes in all new residential schemes to be affordable and that schemes should be designed so that affordable housing is indistinguishable from market housing.
- 5.12 The policy goes on to state that sites of six units or above are required to provide at least 50% one and two bed units.

- 5.13 Whilst we support a mix of dwelling types and sizes, we are concerned that the background evidence to support this policy is not available during the consultation process on the Preferred Strategy. Indeed the Strategic Housing Market Assessment 2013, the Housing Strategy and the Older Person's Strategy are not available at the time of writing. Without the ability to review these documents, it is difficult to make a judgement on the appropriateness of the preferred strategy, particularly in relation to the 50% one and two bed unit requirement.
- 5.14 We are also concerned that the suggested approach is very prescriptive and does not provide flexibility to respond to changing circumstances. Additionally it may not be appropriate on larger sites due to the potential impact of such an approach on viability. Ultimately such an approach may affect deliverability and supply, undermining Policy S1 and Policy S2.
- 5.15 Therefore the second paragraph of Policy CP8 should be deleted.

(iv) Policy CP10: Green Belt

- 5.16 Policy CP10 sets out how the general extent of the Green Belt across the Borough will be retained subject to minor allocations made in the Plan affecting Green Belt, where new development has had the effect of consolidating settlement patterns so as to create a defensible boundary.
- 5.17 The draft Local Plan provides an opportunity to review Green Belt boundaries and to make adjustments where necessary. In Brentwood Borough, where over 80% of the Borough lies within the Green Belt, it is inevitable that in order to meet housing land requirements, a review of the Green Belt boundary is necessary as part of the Local Plan process.
- 5.18 It is therefore a real concern that a key document in the evidence base to this policy is not available at the time of the consultation process. Both the Landscape Sensitivity Testing and Green Belt Assessment are not available and without the benefit of these documents, it is impossible to make a detailed response to the policy.
- 5.19 We maintain that in order to meet the strategic policy objectives set out in the Local Plan, a review of the Green Belt boundary is essential. Given the preferred approach to focus development on Brentwood and Shenfield, a review of the Green Belt boundary around Shenfield should be undertaken. Officers Meadow offers an opportunity to provide much needed market and affordable housing in a sustainable location. The site should be released from Green Belt restrictions.

(v) Policy CP11: Strong and Competitive Economy

- 5.20 Through Policy CP11, the Council is seeking to maintain high and stable levels of economic growth through the growth of existing businesses and the creation of new enterprises. Support will be given to proposals that secure job growth with high value business and retail. Brentwood and Shenfield are intended to be the focus to attract economic growth given their excellent geographic position. We support this policy approach and note in particular the sentiments of Policy CP 11a which seeks to capitalise on the economic benefits that arise from Crossrail.
- 5.21 As emphasised in the NPPF (para 17), a core planning principle is for planning to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort needs to be made objectively to identify and then meet the housing, business and other development needs of an area, and to respond positively to wider opportunities for growth.
- 5.22 We maintain the view that economic development requires the delivery of new homes as well as the creation of jobs and workplaces. Whilst the Borough does have existing constraints in terms of Green Belt, it is important to provide sufficient sites in and around the main centres to meet housing need and economic growth requirements. A review of the Green Belt boundary is therefore essential.

(vi) Policy CP13: Sustainable Transport

- 5.23 Policy CP13 refers to promoting sustainable transport, supporting the development of Crossrail and in suitable locations to consider the scope for 'Park and Walk' schemes. The supporting text includes references to a Shenfield 'Park & Walk' proposal on the Officers Meadow site.
- 5.24 We accept that sustainable transport is a key component of sustainable development. We also agree with the Council that the arrival of Crossrail will provide many benefits to local residents and businesses in terms of an improved service and connections. However we are concerned about the Council's approach towards seeking a suitable site to provide a 'Park and Walk' facility in Shenfield and the suggestion that existing car parks around Shenfield Station could in turn be made available for redevelopment.
- 5.25 Para 3.60 suggests that "*the most appropriate location for a Park & Walk site is to the north-east of Shenfield due to quick vehicle access to the A12 and approx 10 min walking time via Alexander Lane to Shenfield Station*".

- 5.26 We can confirm that neither the landowners nor Croudace Strategic have been approached by the Council to discuss a suggested 'Park and Walk' scheme. Whilst we agree with the Council that the site has quick vehicle access to the A12 and is within easy walking distance of Shenfield Station and Shenfield centre, in the absence of any clear details we object to the Council's approach to the site. In our view, the site is ideally placed to accommodate future housing development to help meet the strategic needs of Shenfield and the Borough generally in compliance with the Council's spatial strategy of focusing new development on Brentwood and Shenfield. To develop the site solely as a 'Park and Walk' facility would represent a missed opportunity to accommodate a significant proportion of housing need in a sustainable location on the edge of Shenfield. We must emphasise again that Officers Meadow is the only potential major housing site within Shenfield to be considered as suitable, available and deliverable (SHLAA, 2011).
- 5.27 Furthermore without the benefit of further information we cannot support the Council's suggested approach towards redeveloping existing car parks around Shenfield Station. There is no evidence available to suggest that the Council has considered whether existing car parks can be utilised more intensively, perhaps with the provision of multi-storey parking on surface level car parks, which would deliver more spaces in close proximity to the station.
- 5.28 We are also concerned that the Infrastructure Delivery Plan which should form part of the evidence base for Policy CP13 is not available at the time of the current consultation. Without the benefit of that document it is difficult to understand how the proposals in the policy will be funded and delivered.
- 5.29 At this point in time we consider that references to specific 'Park and Walk' locations included in the supporting text to Policy CP13 should be deleted.
- 5.30 Notwithstanding the above comments relating to 'Park and Walk', Croudace Strategic would be happy to engage with BBC to explore whether there is scope for a mutually beneficial comprehensive solution to meeting both housing needs and wider parking requirements at Officers Meadow. Any such solution would need to be agreed with the relevant landowners.

(vii) Policy CP14: Sustainable Construction and Energy

- 5.31 Policy CP14 sets out that all residential development is to achieve Code Level 3 as a minimum. Renewable and low carbon energy development proposals located within the Green Belt are required to demonstrate very special circumstances and that harm to the Green Belt is outweighed by the added environmental benefits of development.

5.32 Where on-site provision of renewable technologies is not appropriate, new development can meet the requirements through off-site provision by making 'allowable solutions contributions'. These funds will then be used for energy efficiency and energy generation initiatives or other measures required to offset the environmental impact of the development.

5.33 We support the policy approach of Policy CP14.

(viii) Policy DM1: General Development Criteria

5.34 This policy sets out the criteria which development proposals are required to meet.

5.35 Criteria (f) refers to biodiversity and is worded as follows:

'Proposals for development will be expected to take full account of opportunities to incorporate biodiversity in and around developments'.

5.36 In our view, the wording of criteria (f) is too general and the reference to "*around developments*" is too vague. Whilst measures to incorporate biodiversity within development sites should be encouraged, the ability to deliver biodiversity opportunities on land outside of the application site boundary or allocated site boundary may prove difficult and ultimately affect the delivery of the site.

5.37 Therefore the wording of criteria (f) of Policy DM1 should be changed and the reference to "*around developments*" deleted.

(ix) Policy DM2: Effective Site Planning

5.38 Policy DM2 sets out how planning permission will be granted for development proposals only where access points, routes within the site, building forms and public and private spaces are arranged in an efficient, safe and workable, spatially coherent and attractive manner; where existing site features of value are incorporated. Design-out opportunities for crime also need to be considered as part of development proposals, and the amenities of occupiers of nearby properties need to be safeguarded to ensure that their character and appearance is sensitive to context and surroundings.

5.39 We would question whether Policy DM2 is required as this policy appears to duplicate Policy DM1. Whilst we acknowledge that development proposals are required to address links with adjoining sites, incorporate features of value and design-out crime, these could be (and arguably are already) incorporated within Policy DM1.

(x) Policy DM3: Residential Density

- 5.40 Policy DM3 deals with residential density and requires proposals for new residential development to take a design led approach to density to ensure that schemes are sympathetic to local character and make efficient use of land. Residential densities are expected to be 30 dwellings per hectare net or higher unless the special character of the surrounding area suggests that such densities would be inappropriate. Higher densities, (above 65 dwellings per hectare net) will be expected in town and district centres or other locations with good public transport accessibility.
- 5.41 This policy is overly prescriptive in terms of density requirements. Whilst we support the Council's aspirations to meet its housing requirements through the Local Plan and agree that developers are required to use land efficiently, a policy that sets a blanket density requirement across the Borough may create viability/deliverability issues for sites coming forward. Similarly, it may also be directly at odds with Policy DM1 in requiring higher residential densities than those in the surrounding area, affecting the general character of the area.
- 5.42 The Officers Meadow site in Shenfield is a good example. This site is within a location with excellent public transport accessibility (as recognised in Policy CP13). In accordance with draft Policy DM3, a higher density of development on this site (generally above 65 dwellings per hectare) would be expected on this site if it is allocated for housing. However, such a high density of development on this site would be at odds with the character of the surrounding area. Similarly, if the lower density of 30 dwellings per hectare is prescribed on the Officer's Meadow site, this may also be inappropriate as potentially it may lead to viability issues, ultimately affecting its deliverability.
- 5.43 NPPF (Para 59) stipulates that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. In our view, Policy DM3 is unnecessarily prescriptive and should be reworded to reflect Alternative Approach 1 to secure a design led approach which seeks the efficient use of land on a case by case basis.

(xi) Policy DM11: New Development in the Green Belt

- 5.44 Policy DM11 sets out how proposals in the Green Belt will be assessed. Whilst we note that Policy DM11 broadly follows the guidance on Green Belts as set out in the NPPF, we are concerned that the Green Belt and Landscape Sensitivity Study (part of the evidence base for

the policy) is not currently available at the time of the public consultation exercise. Therefore it is difficult to fully assess the soundness of this policy.

- 5.45 In addition, given our concerns over the West Horndon proposals and the lack of allocated sites in Shenfield, we are of the view that a review of Green Belt boundaries should be carried out. Given the location of Officers Meadow in relation to Shenfield and the railway station, we strongly believe that the site should be removed from the Green Belt and allocated as a Housing Land Allocation Major Site under Policy DM23.

(xii) Policy DM23: Housing Land Allocations: Major Sites

- 5.46 Policy DM23 lists sites for 10 or more homes which are allocated for housing development over the period 2015 to 2030 with an estimated capacity of each site based on the SHLAA. The Officers Meadow site in Shenfield is not identified in the list of Major Sites.
- 5.47 As highlighted in the previous section of these Representations, we re-emphasise the fact that Officers Meadow is available now, is suitably located for development and is within easy walking distance of Shenfield centre and the railway station. It is deliverable in the immediate future.
- 5.48 Despite the Council's preferred spatial strategy of focusing major new development on Brentwood and Shenfield (Policy S1 refers), there are no major sites in Shenfield included under Policy DM23.
- 5.49 In order to reflect the Council's preferred spatial strategy and to carry through the recommendations in the SHLAA (2011), we urge that the Officers Meadow site in Shenfield should be included as a Major Site in Policy DM23.

(xiii) Policy DM24: Affordable Housing

- 5.50 Policy DM24 requires at least 35% affordable on sites for 15 or more dwellings. The policy is very precise on smaller sites and the amount of affordable housing required.
- 5.51 Whilst we accept that the Borough has a high level of housing need, such a prescriptive policy for smaller development sites is likely to have an effect on development viability and may ultimately affect the delivery of smaller sites.
- 5.52 Similarly the requirement for 'at least' 35% affordable dwellings may cause viability problems for the delivery of some larger sites. Setting a 35% target for all sites of 15 dwellings or

more would be more realistic and more effective in delivering housing sites across the Borough.

(xiv) Policy DM29: Accessible, Adaptable Development

5.53 Policy DM29, requires that all new housing development should meet Lifetime Homes Standard. The policy also requires that 5% of new dwellings on developments of 20 or more units should be built to full wheelchair standards.

5.54 We do not support the policy as it relates to Lifetime Homes, which we consider to be unduly onerous. We would however support a revised policy wording requiring that a reasonable proportion of homes on new developments should meet Lifetime Homes Standard.

(xv) Policy DM36: Sustainable Drainage

5.55 The policy requires all development to incorporate SuDS for the disposal of surface water, in order to avoid any increase in flood risk or adverse impact on water quality.

5.56 We support the principle of SuDs drainage and would emphasise that the preliminary drainage strategy for Officers Meadows has been designed accordingly.

6.0 CONCLUSIONS

- 6.1 It is considered that the current approach set out in the Local Plan Preferred Options document does not provide a sound strategy in accordance with the 'justified', 'effective' or 'consistent with national policy' tests of soundness as set out in the NPPF. Notably:
- There is an insufficient background evidence base (a key element of the 'justified' test of soundness), to support the preferred spatial strategy, particularly the intention to distribute 1,500 dwellings to West Horndon. It is questionable whether the spatial strategy is deliverable;
 - The current strategy for growth does not represent the most appropriate option when considered against 'reasonable alternatives' (a key element of the 'justified' test of soundness).
 - It is questionable whether the Local Plan would be 'deliverable' (a key element of the effective test of soundness in the NPPF).
- 6.2 The Local Plan needs to be reconsidered in the light of the requirements of the NPPF's presumption in favour of sustainable development. The NPPF requires Local Plans to be positively prepared and to seek to meet objectively assessed needs. The current strategy does not achieve these objectives and BBC has failed to demonstrate that other alternative approaches are less acceptable.
- 6.3 We consider that the draft Local Plan is 'unsound' and that BBC should provide a more realistic and up to date assessment of need before determining an appropriate housing target and commensurate spatial strategy. Apart from serious concerns regarding the overall quantum of housing proposed we feel that a significant proportion of the 1,500 dwellings proposed to be delivered at West Horndon should be redistributed to higher tier settlements, Brentwood and Shenfield in line with Policy S1. Such a housing strategy would represent the most appropriate option for growth.
- 6.4 The redistribution of dwellings should make provision for major development at Officers Meadow, Shenfield (SHLAA Ref.G091). The Local Plan recognises Shenfield as a sustainable location for growth. It scores highly in the Settlement Hierarchy and offers a wide variety of facilities and services.

- 6.5 There are currently no major sites identified in the draft Local Plan for development in Shenfield and it is vital that this shortcoming in the spatial strategy should be rectified.
- 6.6 It is therefore considered that a reasonable proportion of the Borough's overall housing need should be accommodated within or immediately adjacent to the settlement of Shenfield. Officers Meadow offers an ideal opportunity to secure a deliverable allocation which would:
- Make a valuable contribution to meeting local housing need;
 - Secure an effective and balanced supply of dwelling types and tenures and
 - maintain and enhance the economic viability and vitality of the settlement which will shortly benefit from the advent of Crossrail.
- 6.7 The evidence set out in this report demonstrates that Officers Meadow, Shenfield represents a sustainable and suitable site for residential development which should be allocated in the Local Plan.