

BRENTWOOD BOROUGH LOCAL PLAN 2015-2030 – PREFERRED OPTIONS CONSULTATION

We are writing on behalf of EA Strategic Land LLP (EA Strategic) in response to the consultation on the Brentwood Local Plan Preferred Options (the Plan). EA Strategic has an interest in land in West Horndon, and is working with neighbouring landowners and stakeholders to bring it forward for development through the plan-making process.

We support the overall strategy and commend the work that the Council is undertaking in order to ensure it has an up-to-date local plan in place. The implications of not having an up-to-date plan can be significant. It would result in uncertainty regarding the ability of Brentwood to accommodate the growth it needs and make it difficult to defend inappropriate development in the Borough. We understand that the Council will continue to prepare and update its evidence base in accordance with the requirements of the NPPF.

A number of more detailed comments relating to the soundness of the Plan and individual policies and objectives are set out below.

a. Overall Strategy

We support the proposals to achieve growth that are put forward in the Strategic Objectives, including those within Objective SO1 regarding the specific locations. These existing urban areas have the greatest access to existing and proposed local services and are therefore considered the most suitable.

The approach is set out in further detail in the Spatial Strategy (S1) and once again the locations in which to focus the development are supported. We agree that these locations, including West Horndon, are capable of ensuring that Brentwood Borough Council is able to accommodate the growth required over the period of the Plan. This proposed strategy is considered to be the most appropriate, and in particular we agree that Alternative Option 3 (semi-dispersed growth (larger villages)) is not suitable. This alternative option would not enable sufficient delivery of growth or critical mass to enable improvements to infrastructure; settlements such as West Horndon not only provide the most logical solution in terms of infrastructure constraints and accessibility, but can take advantage of under-utilised existing infrastructure, notably the excellent rail links of the settlement.

The proposed change to ensure that the strategic allocation at West Horndon is not within the Green Belt boundary is also welcomed; however, it is considered that it would be beneficial to extend this allocation to include the entire parcel of land to the west of Thorndon Avenue, not only the southernmost section. This will create a defensible boundary to the Green Belt using the roads as recognisable and permanent physical features as set out in Paragraph 85 of the NPPF. This would ensure the Council can be satisfied that the Green Belt boundary will not need to be altered before the end of the Plan period. This additional land can provide the necessary flexibility concerning the form

of future development proposals, particularly associated with allowing for the provision of the necessary supporting services and facilities to meet the needs of the growing population.

By way of justification for Policy S1, the Council has set out a settlement hierarchy in paragraphs 2.12 to 2.16. The purpose of this is to show how it has assessed the suitable locations in which to accommodate growth in a sustainable manner. West Horndon is categorised in settlement category 3 as a "larger village". In our opinion it is a more significant settlement than that and should be categorised as such. The existing connectivity of West Horndon, and its position as one of the few settlements with a railway station after Brentwood and Shenfield, demonstrates that it merits a higher position in the hierarchy. We would suggest that a new tier of settlement should be created above category 2 (village service centres) and that this should be entitled "Garden Village" settlements.

b. Spatial Strategy and Policy S2

Policy S2 highlights the provision in the Plan for 3,500 new dwellings to be built between 2015 and 2030 and we note that 1,500 of these are intended to be accommodated in West Horndon.

The level of delivery required in Brentwood cannot presently be established. In our view, there is a sequential process that the Council needs to follow: firstly, the objective housing need for the Borough should be determined, which fundamentally, requires the completion of the Strategic Housing Market Assessment (SHMA). Secondly, a view should be taken on whether through the 'duty to cooperate', some of this need can be met in adjoining boroughs. Thirdly, through a combination of associated evidence, including an analysis of infrastructure deficiency, landscape assessment and land quality and sustainability appraisal, a balanced approach should be taken to the relative merits of meeting the housing need of the Borough versus the potential impact on the character and quality of the Borough. Only at that stage can the emerging Plan confidently and robustly promote options for growth. The Council should therefore allow sufficient flexibility to respond to the findings of the SHMA and associated evidence at this stage of the Plan, and recognise that the level of growth presently proposed is likely to be a minimum.

Paragraph 2.20 highlights that the Council does not consider it possible to accommodate fully the scale of growth implied due to significant constraints, notably the potential harm to the landscape, Green Belt, settlement identity, character and traffic congestion. Those findings may prove to be correct. However, they should be as a consequence of the sequential approach identified, rather than a pre-determinant to the development plan process. In addition, Paragraph 2.21 implies that the delivery of the remainder of Brentwood's housing need may be possible in adjoining boroughs through the "duty to cooperate". This is a fundamental point in determining the Borough's housing land allocation, and accordingly, this discussion should lead, and not follow, the proposed growth option. In the event that the adjoining boroughs are not able to assist with Brentwood's housing need, the Plan should ensure it has sufficient flexibility to provide more homes in the Borough.

In our view additional development can be delivered within the Borough without resulting in adverse environmental impact. An obvious option is to rely more comprehensively on those Green Belt incursions presently identified. However, Brentwood is right to determine that development should not come at any cost. Consequently, both existing and future allocations should be capable of demonstrating that they can bring forward the necessary services and infrastructure to contribute to an overall improvement in the quality of life of Brentwood residents, businesses, and visitors. From the work that our client has undertaken specific to West Horndon, we can readily identify the benefits of a larger allocation. That same test should be applied across the Borough when assessing the ability for the Borough to meet its housing need.

c. West Horndon Opportunity Area – Policy CP4

This policy is supported in principle. However, as referred to in the paragraphs above, in our view it should allow for greater flexibility for an increased capacity at West Horndon. This would enable the Council to more readily meet its Borough-wide housing need.

Indeed the second paragraph of Policy CP4 acknowledges that this is the case over the Plan period. By initially removing a larger area of land from the Green Belt, the Council will be in a more defensible

position to ensure that the services and infrastructure required for 1,500 new homes can be provided, including all the facilities this "Garden Village" settlement needs, without additional, subsequent Borough-wide encroachment into the Green Belt. Page 196 identifies that not all of site 037B is to be allocated, but the whole site is needed to ensure that the requisite infrastructure and facilities can be accommodated.

d. Green Belt – Policy CP10

The exclusion of the settlement of West Horndon from the Green Belt is supported. However, there is a need to ensure that the settlement boundaries across the Borough, referred to in Paragraph 3.36 of the Plan, are drawn to include sufficient land to ensure that there is flexibility for the delivery of housing and associated services, infrastructure and facilities, in addition to the required housing, as referred to in the paragraphs above. As it currently stands, we have not seen illustrated the full extent of the proposed West Horndon settlement boundary, and this should be subject to publication and consultation as soon as possible. As stated above, our clear preference is for a wider allocation of land to the west of Thorndon Avenue, West Horndon, which we believe will provide for a long term, defensible Green Belt boundary formed by the A127 to the north, Childerditch Lane to the west, and the railway line to the south. Alternatively, reference will need to be made to provision for an early review of the Green Belt boundary over the course of the Plan period, in order to meet the Borough's housing and infrastructure requirements.

e. Sustainable Construction and Energy – Policy CP14

We are supportive of this policy in principle, but would like to draw the Council's attention to the Housing Standards Review and the Government's proposal to wind down the Code for Sustainable Homes. The Council should keep the Government's intentions in mind and allow sufficient flexibility in the policy to achieve this.

f. Housing Land Allocations – Policy DM23

As discussed in earlier paragraphs, we support the provision for housing at West Horndon; however, we consider that it is capable of delivering additional housing capacity at an earlier stage in the Local Plan period – were it to be determined by the Council's objective assessment of housing need to be necessary. Furthermore we consider that West Horndon is not simply a housing allocation, but has the credentials to be comprehensively planned as a "Garden Village" settlement, capable of providing for an increasing population both through additional housing, and also the associated infrastructure and services required to benefit the amenity of existing and future residents. As such, we are of the view that it should be contained within a separate policy and not listed alongside the other smaller scale housing allocations. A new, expanded community will be created at West Horndon and the Plan should be explicit in this regard, and be positive in its promotion.

We consider that the alternative allocations do not necessarily include those that are most suitable or deliverable. It would be more logical to allocate a larger area to the west of Thorndon Avenue in order to create a defensible boundary to the Green Belt, and allow sufficient flexibility to meet housing need as well as associated infrastructure.

Thank you once again for the opportunity to respond to the Local Plan Preferred Options consultation. We would be very grateful for confirmation that these representations have been received and confirm that we would like to be involved in future stages of the Local Plan process.

Yours sincerely,


David Churchill
DIRECTOR

cc. David Kavanagh – EA Strategic Land