

Essex
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DRAFT
BY EMAIL AND POST

Dear Sirs

RE: BRENTWOOD BOROUGH LOCAL PLAN 2015 – 2031 – PREFERRED OPTIONS CONSULTATION - REPRESENTATIONS ON BEHALF OF ASPHALTIC DEVELOPMENTS LIMITED

We act on behalf of Asphaltic Developments Ltd and write in respect of the above consultation, to which we are instructed to submit representations. We therefore request that the contents of this letter are taken into account as part of the consultation exercise.

Whilst we appreciate that this letter is submitted after the formal consultation period has closed (on 2nd October), we would confirm that, in discussions with Ms Alex Bird in your policy team (on 9th October and 17th October), we have been advised that representations – and more specifically a suggested site allocation for housing, which this letter proposes – will be accepted by the Council, for consideration alongside all other responses received to the Preferred Options Consultation.

Accordingly, our client, who has an interest in the Brentwood Leisure Park, at Warley Gap, Brentwood, has instructed Rapleys to make representations to the Local Plan Preferred Options document that may have a bearing on any future possible redevelopment of that site. The extent of our client's interest is detailed on the attached plan (drawing ref: 159/30/3_SLP01).

Brentwood Leisure Park

The site is an existing outdoor leisure park, situated to the south of Brentwood Town Centre, within the Metropolitan Green Belt. The site extends to 7.825 ha in total, with that area of the site excluding the wooded area (and therefore considered that which could be developed most readily), extending to approximately 5.6 ha. That part of the site represents brownfield land.



The Leisure Park is accessed from its main entrance off Warley Gap. It consists of an outdoor dry ski and snowboard centre at the western end, a driving range with covered bays in the central part, and beyond, on the eastern part of the site, a restaurant, a vacant leisure centre and an outdoor kart centre with a sales/reception building. The Leisure Park is served by an extensive parking area in the northern part of the site.

The site is surrounded by Holden's Wood. The dry ski and snowboard centre extends to approximately 1ha in area, with its main slope running from the north to the south, and a smaller slope at the southern end of the site. The centre has a log clad reception building, which is accessed from the pedestrian entrance/access route from the main car park.

In terms of topography, and aside from the ski / snowboard slope itself, the site is relatively flat. The centre contains a number of mature trees, including three no. trees within the main ski slope. These clusters of trees and the surrounding woods are the subject of Tree Preservation Orders (TPOs).

Proposed Housing Allocation

In response to the current consultation, the Council's objective to "plan for housing that meets the needs of the Borough's population and contributes to creating inclusive, balanced, sustainable communities", is supported and welcomed. In addition, we generally support Policy S2, insofar as it confirms that provision will be needed to meet a housing requirement for the Borough of 3,500 new dwellings in the Plan period 2015 – 2030.

However, we would draw attention to the working draft of the "Objectively Assessed Housing Needs Assessment" in which we understand that c. 5,500 new dwellings are identified as being required in the plan period. In that regard, it is clear that the Council needs to identify further sites to deliver that requirement.

Furthermore, Policy CP2 is noted in that it confirms the locations for growth within the Borough, and that in selecting sites for allocation, or granting planning permission, the Council will have regard to, inter alia, areas where development should not take place (e.g. undeveloped Green Belt sites) and the need to ensure a flexible and responsive supply of land, and to prioritise the re-use of previously developed land.

The allocations set out in Policy DM23 are noted, and more specifically those two sites that are located within the Green Belt and allocated for housing development under the terms of the policy (i.e. Sow and Grow Nursery - for 48 dwellings - and Ingatestone Garden Centre - for 130 dwellings). It is noted that the allocations are made (as per the Draft Site Assessment supporting document) on the basis that it is considered that they are brownfield land with existing buildings in the Green Belt, which might be appropriate for redevelopment in order to protect other greenfield Green Belt land. Furthermore, it is noted that they are connected to or close to urban areas, thereby providing sustainable urban extensions without the use of greenfield land. This approach to site selection is generally supported.



Accordingly, it should be noted that the Leisure Park site could come forward for redevelopment in the short to medium term, should the existing uses become unviable. At such a time as any existing uses on the site become unviable in terms of their on-going operation, it is considered that the site represents an available location for redevelopment for alternative uses, and is a suitable (previously developed) site for residential use. In those terms, it would meet the priorities of the Council's emerging Housing Strategy for the Borough which seeks to meet housing need and secure a supply of housing in order to do so.

The site is currently located within the Metropolitan Green Belt. It is considered that this site, in relation to its location and surroundings, is suitable for removal from the boundary of the Metropolitan Green Belt, on the basis that its characteristics do not fulfil the purposes of including land within the Green Belt, as set out in the NPPF. Accordingly, the removal of the site from the Green Belt boundaries would not alter the position in terms of:

- i) Checking unrestricted sprawl;
- ii) Preventing neighbouring towns from merging;
- iii) Assisting in safeguarding the countryside from encroachment ;
- iv) Preserving the setting and special character of historic towns ion the locality, and
- v) Assisting urban regeneration.

Conclusions

Consequently, we would at this stage put forward the Brentwood Leisure Park, as detailed on the attached plan, for consideration as a Housing Land Allocation, for inclusion within the emerging Local Plan as such. We consider that the site has a number of tangible merits, which render it suitable for future residential development, namely:

- The site can sustainably accommodate residential development, supporting the Council's aspirations for housing growth;
- The site is considered suitable for removal from the boundary of the Metropolitan Green Belt, on the basis that its characteristics do not fulfil the purposes of including land within the Green Belt, and
- The site is well placed in relation to the existing built form, and constitutes previously developed land, and is therefore a sustainable location for growth as an extension of the more urban area.

We would welcome further discussion with the Council relative to the site, and its prospects for redevelopment for residential uses. We would suggest that a meeting with Officers would be beneficial, so that our representations, and suggested site allocation, can be considered further relative to emerging policy.

In the meantime, we respectfully request that the Council considers the representations in full and that those considerations will be reflected in the next stage of the document's preparation. We would ask that our details are held on file, so that we are kept informed and updated of the forthcoming stages of the preparation of the Brentwood Borough Local Plan.



We will be pleased to provide further information or explanation on these representations should it assist. In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise, marked for the attention of Hannah Pearce at this office.

Yours faithfully

