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Planning Policy Team
Brentwood Borough Council
Town Hall
Ingrave Road
Brentwood
Essex
CM15 8AY

Our ref: 22230/A3/JK

25th September 2013

Dear Sir or Madam,

BRENTWOOD LOCAL PLAN 2015-2030 PREFERRED OPTIONS CONSULTATION

On behalf of our client, Threadneedle Property Investments Ltd, please find below representations with respect to your draft Local Plan. These representations follow earlier representations submitted with respect to the Council's Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Review (ELR) where we have promoted part of the West Horndon Industrial Estate for residential-led purposes.

Support – Figure 2.1 Key Diagram, Page 10

Our client supports the identification of new homes to be constructed on land to the west of West Horndon. Our client's site, which is part of the West Horndon Industrial Estate and forms part of the land identified as part of the Strategic Allocation, is a brownfield site that is located in close proximity from West Horndon train station and is therefore a highly sustainable and accessible location that would be ideal for residential development. In our opinion, this allocation is supported by the objectives of the National Planning Policy Framework (NPPF) and will assist Brentwood Council in meeting its significant housing needs.

Support – paragraph 2.7, page 11

Our client supports the conclusion of 2.7 and the reference to West Horndon as a location for the construction of new homes.

Support – paragraph 2.9, page 11

Our client supports the conclusion of 2.9 and the reference to the construction of new dwellings in West Horndon.

Support – Policy S2: Amount and Distribution of Residential Development 2015 – 2030, Page 14

Our client supports the conclusion of Policy S2 and the reference to the construction of new dwellings in West Horndon.



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Comment - Policy S4: Provision for Retail and Commercial Leisure, page 26

Our client wishes to point out that the provision of retail and commercial leisure floorspace in West Horndon will not be delivered unless new homes are constructed in this location in order to create the necessary critical mass and demand to sustain its existence. This level of demand is likely to be generated through the construction of new homes in West Horndon.

Support - Policy CP3: Strategic Sites, Page 32

Our client supports the reference in Policy CP3 to a new mixed use development in West Horndon, but seeks Brentwood Council's agreement to refer to this Strategic Site Allocation as a "residential-led mixed use development".

Support - Policy CP4: West Horndon Opportunity Area, Page 33

Our client supports the reference in CP4 to the regeneration of the employment land in West Horndon to deliver housing. Our client also agrees that there is scope for further housing capacity in this location.

In the event that Brentwood Council's preferred option is not progressed, our client would prefer Alternative Approach 1 (Redevelop for housing with supporting community, health and retail facilities) rather than Alternative Approach 2 (Redevelop to provide a high tech business park with some residential and community facilities).

Support - Policy CP10: Green Belt, Pages 46 and 47

Our client supports the exclusion of West Horndon from the Green Belt as identified on the Policies Map.

Comment - Policy DM6: Areas Allocated for General Employment and Office Development, Pages 84

Our client seeks Brentwood Council's agreement that the 5 hectares of new employment land (as part of the West Horndon Strategic Allocation) is not identified on the Policies Map on the West Horndon Industrial Estate site, but located on a new site that benefits from much better access to the A127 and M25. This would make much better sense from a highway network, infrastructure and accessibility point of view.

Comment - Policy DM9: New Retail and Commercial Leisure Development, page 91

Our client wishes to point out that the provision of retail and commercial leisure floorspace in West Horndon will not be delivered unless new homes are constructed in this location in order to create the necessary critical mass and demand to sustain its existence. This level of demand is likely to be generated through the construction of new homes in West Horndon.

Support - Policy DM23: Housing Land Allocations – Major Sites, Pages 128

Our client supports the inclusion of Sites 020 and 021 as part of the West Horndon Strategic Allocation (reference 22). Please see below for comments on the phasing for Site 020.

Our client does not support the Alternative Approach or Alternative Allocations suggested.

Support - Appendix 2: Preferred Housing Allocations and Small Sites Allowance 2015-2030, page 193

Our client supports the inclusion of Sites 020 and 021 as part of the West Horndon Strategic Allocation in Appendix 2.

Our client is aware that Brentwood Council has suggested that approximately 250 dwellings could be constructed on Site 020 (the equivalent of 39 dwellings per hectare). However, on the basis that this site is located close to the settlement centre and its train station, our client considers that a greater density of development could be achieved in this location. We therefore respectfully request that Brentwood Council increases the approximate density for this site to a minimum of 320 dwellings (the equivalent of 50 dwellings per hectare).

Comment - Appendix 3: Housing Trajectory, page 202

Our client is of the opinion that Site 020 would be available and deliverable in the financial year 2015/2016 and therefore seeks Brentwood Council's agreement to bring forward the trajectory of this site to 2015/2016 to 2019/2020. We also suggest that the annual construction on this site is increased to 64+ dwelling per annum (320 dwellings over five years) during this period to reflect our comments regarding density for this site, as discussed above.

To conclude, we consider that our client's site has great potential to meet Brentwood Council's housing needs and help deliver socio-economic infrastructure improvements for the residents of West Horndon. The redevelopment of our client's site for residential purposes would also result in a reduction in heavy vehicle traffic and noise impact through the settlement which has been identified by local residents as a high priority during the Council's public consultation exercise.

We therefore support Council's aspiration to encourage new residential development in West Horndon, particularly the redevelopment of the West Horndon Industrial Estate (Site 020).

We would be grateful if the above representations could be taken into account when considering the next stages of the Local Plan adoption process.

Yours faithfully,



JUSTIN KENWORTHY
Director