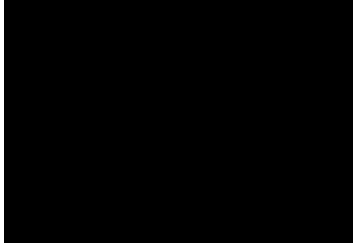


Mr. Phil Drane
Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY



By Email Only

Dear Mr Drane,

Preferred Options draft Local Plan 2015-2030 – Representations submitted on behalf of the South Essex Partnership University NHS Foundation Trust

I write on behalf of my client, South Essex Partnership University NHS Foundation Trust in response to the Borough Council's consultation regarding the Preferred Options draft of the Local Plan 2015-2030. I would like to make the following representations relating to the draft policies within the Plan and the Sustainability Appraisal (SA, August 2013):

Policy S1: Spatial Strategy

My client **supports** the general principles of the Council's preferred spatial strategy and the key sustainability criteria used to identify the proposed development allocations:

All development sites will be identified having regard to whether they:

- a) *are accessible to public transport, services and facilities*
- b) *will have **no significant impact** on Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood-risk, air and water pollution*
- c) *are likely to come forward over the plan period*

We would however **contend** that giving due consideration to these criteria there are a number of sites that would pass these requirements which have not been proposed for allocation, particularly my client's site at Pastoral Way, Warley (#083, Draft Site Assessment and Option 27, SA).

a) Accessibility

The site's proximity to Brentwood town centre and Brentwood train station renders it highly accessible to public transport, as well as a variety of local and town centre services and facilities within walking distance.

b) Heritage

The curtilages of two listed buildings adjoin the site, however we believe the site can be sensitively developed to give due care and attention to the important setting of these buildings to ensure there is '*no significant impact*' on them or their setting.

b) Transport

A transport appraisal will need to be undertaken to support a planning application however there is no reason to believe that the development will have such a negative impact on the local road network to render the site unsuitable for allocation. In addition, the exceptionally sustainable location of the site should significantly reduce potential car dependency.

b) Ecology

The site adjoins a County Wildlife Site and contains mature vegetation along three boundaries, so prior to its development it is reasonable to expect that an Ecology Survey would be undertaken to assess the likely presence of wildlife at the site, with particular attention to protected species. If this assessment concludes that further survey work would be required this should be commissioned. It should be noted however that the main area of the site comprises either built development or carefully managed lawn hence the opportunities for highly sensitive ecological constraint that could prevent development are limited. The site should therefore be considered suitable for residential allocation.

b) Flood Risk

The site is located within flood zone 1 and is therefore suitable for residential development in this regard, however any proposed development could reasonably be expected to utilise sustainable drainage systems to ensure the development of the site does not increase surface water flooding at the site or at any neighbouring property.

b) Air Quality

The area is not identified as being located within an Air Quality Management Area and it is not expected that the development of the site would significantly alter local air quality.

b) Green Belt, Landscape and Visual Amenity

In relation to landscape and visual amenity the impact of development is expected to be limited. Although the land adjoining the site is a Special Landscape Area the site itself is not within it and any development at the site would be respectful to its woodland character. The site is well screened by an attractive mature tree line around its periphery which substantially restricts views into and out of the site; this would help contain any new development and ensure the character along Warley Hill will appear largely unchanged.

Although the site is located within the Green Belt, it is a previously developed site (at least in part) and its function as Green Belt has diminished greatly over time. The redevelopment of the neighbouring Warley Hospital site to the west/north-west and the pending redevelopment of the former Mascalls Hospital site to the south-west will almost enclose the site with built development, thereby removing the Green Belt functionality of the site entirely. Paragraph 80 of the National Planning Policy Framework (the Framework) lists the following five purposes of Green Belt; we have assessed the site against these criteria to demonstrate that it should no longer be included within it:

To check the unrestricted sprawl of large built-up areas;

Given there is built development which extends further north, south, east and west than my client's site it cannot be deemed to perform this function.

To prevent neighbouring towns merging into one another;

The nearest neighbouring town to this part of Brentwood is Romford which is c.2.75km distant due west and the nearest village is Great Warley c.1.4km due south, however in both cases there is already built development between the site and these settlements, as such it does not perform this function.

To assist in safeguarding the countryside from encroachment;

As detailed above, the redevelopment of the former Warley Hospital buildings and the anticipated redevelopment of the former Mascalls Hospital site have and will continue to extend built development into the countryside further west than my client's site would if it were developed. If the latter is implemented this would significantly reduce the open and undeveloped countryside in this area of the Borough. What remains to the west of the site is a narrow swathe of countryside which comprises almost entirely of dense woodland known as Clement's Wood. This creates a strong sense of enclosure felt at the site and prevents open countryside views. The continued designation of this land would not therefore safeguard the countryside from encroachment as previous and planned development on two other brownfield sites further west have already done this.

To preserve the setting and special character of historic towns; and

On the basis that the site is surrounded by built development to the north-west, north, east and south, with major development expected to come forward to the south-west, it is not considered that it contributes toward the setting of the historic town of Brentwood. Notwithstanding this the setting of the nearby listed buildings will need to be given careful consideration if the site were redeveloped, however this is not considered an insurmountable constraint and certainly does not justify a Green Belt designation in its own right.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is clear from reviewing the Council's draft Local Plan that there is likely to be a deficit of development sites to accommodate the Borough's growth needs, urban, brownfield or otherwise. This matter is discussed in more detail below, however it is clear that the extent of the undersupply of development land in Brentwood is such that the release of this site from the Green Belt would not discourage the recycling of brownfield land. Demand in the Borough is consistently high and land values remain strong, as such derelict and other urban sites are still attractive development options. The site cannot therefore be considered to serve this function of Green Belt.

On this basis we must urge the Council to accept that the site no longer performs the five purposes of Green Belt described in the Framework and should therefore be removed from the Green Belt through a comprehensive review process. Paragraph 85 of The Framework reaffirms this where it says that when defining Green Belt boundaries local planning authorities should "*not include land which it is unnecessary to keep permanently open*", as in this case. We understand that the Council is undertaking a 'Landscape Sensitivity Testing and Green Belt Review' however at the time of writing it has not been published so we are unable to comment on its methodology or scope at this stage. Nonetheless, we maintain that the site should be re-allocated for housing.

c) Likely delivery within the Plan period

It has been demonstrated that the site clearly passes the Council's sustainability test set out at draft policy S1 and so in the absence of any evidence suggesting otherwise, we can only assume that the site has been discounted on the basis that the Council is unsure of its likely delivery within the Plan period. When we met with the Council prior to the publication of the draft Local Plan my client discussed the various potential development options they were considering for the site at that time. If this discussion has led the Council to be uncertain of the Trust's intentions we would like to formally confirm that the Trust is committed to developing the site entirely for housing. The Trust investigated various healthcare related options as discussed in our meeting with Planning Officers, however it has been decided not to proceed with these. We would also remind the Council that all healthcare-related uses at the site ceased when the properties on the site were vacated in February 2012 and the site is within single ownership. The site should therefore be considered as vacant brownfield land likely to come forward within the first 5 years of the Plan period.

Policy S2: Amount and Distribution of Residential Development

My client **contends** that the Council's preferred housing target of 3,500 new homes over the Plan period cannot be deemed sound on the basis that it will not meet the Council's objectively assessed housing need (detailed at paragraphs 2.29 – 2.32 of the draft Local Plan) despite there being suitable sites which have not been allocated for housing. My client understands that there are considerable constraints to development across the Borough which may inhibit growth capacity, however we **object** to the Council's notion at paragraph 2.32 that "*Above this [proposed target], the consequences of development would cause irrevocable harm and it would become harder to deliver in a sustainable manner...*" As we have demonstrated above my client's site is a highly sustainable location for development and meets the Council's own assessment criteria for allocation. It would make a valuable contribution toward meeting local housing need and yet it has not been included in the Borough's housing provision. On the basis that my client's site has been discounted when it is entirely suitable for housing development, we must assert that in our view the Council's justification for this preferred strategy is unsound.

Policy DM23: Housing Land Allocations – Major Sites

Further to the comments made in relation to Policies S1 and S2 above, my client **objects** to the discounting of their land at Pastoral Way, Warley which we have proven would be a highly suitable and sustainable housing allocation. The accompanying wording to this policy does not provide any justification or rationale for why the site has been discounted, which only states that it '*could be suitable*' for up to 85 dwellings.

Sustainability Appraisal (August 2013)

The Council's Sustainability Appraisal (SA) undertook an assessment of the site, however this does not provide any further clarity on why the site has been discounted either. The SA site review reaffirms the site's suitability demonstrating its high sustainability credentials. The only potential matters flagged are:

- BIODIVERSITY: The site is 1km from the nearest SSSI (Thorndon Park);
- LANDSCAPE: The site is in the Green Belt; and
- LANDSCAPE: The site adjoins a Special Landscape Area.

In the first instance it should be considered that although Thorndon Park is approximately 1km from my clients land there is built development between the two and so we propose that the residential development of the site would have no greater impact on the SSSI than its current permitted use. We have discussed the site's Green Belt designation in some detail above and have provided sufficient justification as to why the site should be removed from the Green Belt and therefore its designation should not pose a constraint to the development of the site. Also, as discussed above, the designation of neighbouring land as a Special Landscape Area should not preclude the allocation of the site. The SLA is an area of dense woodland, as such development at the site is unlikely to directly impact on its special character. Moreover this is something that can be carefully considered during the design stage of a planning application.

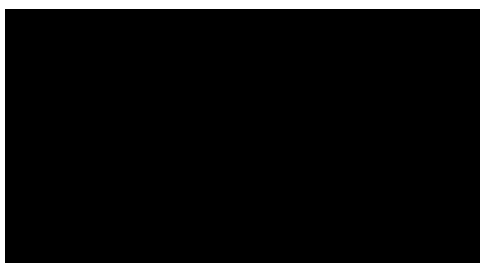
None of these matters would result in '*significant harm*' (draft policy S1), nor do they pose insurmountable barriers to development. They are also significantly outweighed by the considerable sustainability credentials of the site (acknowledged by the SA), particularly the contribution the site would make to delivering much needed new homes.

Conclusion

For the reasons detailed above the draft Local Plan cannot be considered sound without the allocation of my client's land for housing.

I trust the above representations will be taken into account by the Council in the preparation of the Submission Draft Local Plan.

I would be grateful if you could confirm receipt of this letter.



Copy Christopher Howlett, South Essex Partnership University NHS Foundation Trust
Vic Saunders, South Essex Partnership University NHS Foundation Trust
Tim Wheeler, South Essex Partnership University NHS Foundation Trust