

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

16 February 2015

Dear Sir/Madam,

Re Brentwood Borough Local Plan 2015-2030 – Strategic Growth Options Consultation

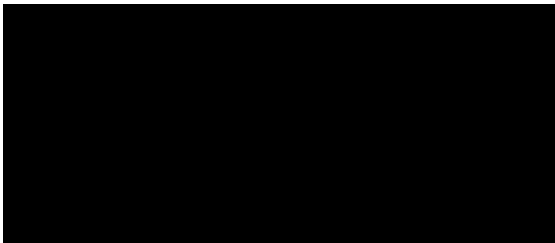
We set out below our views on the proposals outlined in the Council's Strategic Growth Options Consultation. Answers to the specific questions asked in the consultation are included in the appendix to this letter.

We are very concerned about the impact the strategic development proposal will have on the quality of life in Brentwood and the surrounding area. We are proud that 89% of Brentwood Borough is Green Belt and the Council, as custodians of the local environment, should be doing everything in its power to protect the Green Belt and to retain the essential character of our Borough. If the Council's proposals go ahead as suggested, this will have a significant impact on the amount of Green Belt in the Borough. The potential environmental damage cannot be undone.

The development will result in the local population and housing growing significantly and it is difficult to see how this will maintain the quality of life and environment enjoyed by those who already live and work in the Borough. This will change the historical and cultural character of Brentwood and its surrounding area fundamentally and in our opinion for the worse. We cannot see how the local area will be able to cope with such an increase. The roads and infrastructure will not be able to support the huge development plans. We note that much of this change seems to be driven by the impact of the Crossrail project. Crossrail should be a benefit for local residents not an excuse to over develop Brentwood. It should not be up to Brentwood residents to cater for the demands of people who want to move here because of Crossrail. One example of the impact is parking at Shenfield station; this already seems to be at full capacity and it is difficult to see how the planned increase in population, who will be mainly seeking jobs in London, can be accommodated.

The consultation is predicated on one key statistic, the need to build 360 homes per annum for the next 15 years. We are not convinced that this statistic is valid, not least because the latest set of household projections is not yet available and it does not align with past experience of growth in the Borough. Hence our suggestion in response to question 3 that Brownfield sites should be used first (over the next 7 years) so that the Council has more time to see what actual need is generated from local growth and Crossrail.

We note that you state on page 6 that it is essential that the Local Plan is informed by robust and up to date evidence. But we fail to see how you can produce the consultation document and carry out the consultation having only half of the technical studies available. In this respect we believe the consultation is fundamentally flawed and consider that the Council should reissue the consultation document and seek a further consultation once these vital reports are available.



Appendix – Strategic Growth Options Consultation – Consultation Questions

Q1: Do you agree with the three broad areas, for the purpose of considering approaches to growth?

We don't see any reason why the Borough should be split into three distinct areas. Splitting it into three areas may lead to over simplification and over generalisation of area characteristics. We consider that the plan should cover the Borough as a whole, because any development affects all residents. We can see benefit to the proposed development of the Dunton Garden Suburb, as its proximity to the A127 and C2C means that the impact on local roads will be minimised.

Q2: Do you agree with the issues raised for each of these three areas?

We are concerned that the local road infrastructure in the A12 corridor servicing in particular the potentially huge Green Belt development will be overwhelmed leading to further delays and congestion particularly during the rush hour and during the school run times. We are also concerned about the impact of the increase in lorries during any development phase as the local roads are not built for such heavy large traffic and also the increase in noise and environmental pollution this will create.

Q3: Do you have any comments on the appropriateness of particular sites?

We consider that it is essential that Brownfield sites in the area are used first before any building is considered on Greenfield or Green Belt sites. We note that Brownfield sites can cope with the development of 2,500 new homes. We are not convinced that the Borough needs to support an extra 360 new homes per year (see further question 12). But if this were the case, then the Brownfield sites should be used for the next 7 years without recourse to Greenfield sites or to Green belt. This would have two benefits, it would put the Brownfield sites to good use, which are often left in an unsightly state and hence this would have a positive impact on the environment. Although it is also important to consider the environmental impact of using Brownfield sites as these can often have high invertebrate value. Also such a policy would retain the Greenfield and Green belt sites undisturbed. During this period the Council would get a better understanding of the impact of Crossrail and the need for further expansion in the Borough.

We foresee a danger that a very small number of landowners have already put forward their farms which represent substantial amounts of Green Belt for development. The Council needs to make sure that it does not take the 'easy option' and be persuaded by landowners wanting to make substantial profit by change of use of their land from farming to development. This would have the detrimental effect of substantially reducing the amount of Green Belt in Brentwood and in some circumstances valuable wooded Green Belt. The consultation document doesn't say how much the Green Belt would be reduced by its proposals, but clearly this would be substantial and would in our view change the essential nature of Brentwood and its surrounding area.

Q6: In order to provide for local need is it preferable for greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within Green Belt)?

As noted above, we believe that any development should first be undertaken on Brownfield sites. We would suggest that a modest increase in Greenfield sites on the edge of villages might be acceptable as long as the essential character of the village is not compromised and a full environmental impact assessment is carried out first.

Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?

We agree that if there is a need it would make most sense for any future employment to be met by allocating new sites close to the strategic highways. However, it is far from clear what this need will be. You have pointed out in the report that the level of unemployment in the area is the lowest in Essex at 3.6% and also that the majority of employment is gained in London. The proportion of people working in London is likely to increase when Crossrail is finished and hence the increase in the need for local employment will be

impacted by this. We are not sure how the consultation has taken this likely impact into account, not least because the impact study is not yet available. Crossrail is likely to further enhance Brentwood's status as a commuter town, which is likely to mean less land may be needed to promote further local employment.

Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a “Town Centre First” approach should be taken to retail development?

We generally agree with the 'Town Centre First' approach. However, we are concerned that the plans do not adequately address the need for parking in Brentwood. In general, the plans seem to be taking away existing parking and adding further retail development. This on its own doesn't seem to be a viable.

Q9: Are there opportunities for more open space provision in the area where you live?

At present we do not see the need for the provision of more open spaces in the area where we live. However, if the proposals go ahead as suggested, then it is likely that we would need the provision of more open spaces as the area where we live will be decimated by the development on Green belt land.

Q10: Please rate the level to which you value the landscape near where you live. (See Page 29)

Aspect:	Very Low	Low	Average	High	Very High
Scenic Beauty / Attractiveness	1	2	3	4	5
Outdoor Recreation / Leisure Use	1	2	3	4	5
Wildlife Interest	1	2	3	4	5
Historical Interest	1	2	3	4	5
Tranquillity	1	2	3	4	5
Other – please specify:	1	2	3	4	5

Q11: To what extent do you think the following is present in the landscape near where you live: Houses; Commercial buildings; Nature Reserves; Farmland; Woodland; Wasteland; Infrastructure; Leisure Facilities; other? (See Page 29)

Aspect:	Very Low	Low	Average	High	Very High
Houses	1	2	3	4	5
Commercial / Industrial buildings	1	2	3	4	5
Nature Reserves / Wildlife	1	2	3	4	5
Farmland	1	2	3	4	5
Woodland	1	2	3	4	5
Degraded / Derelict / Wasteland	1	2	3	4	5
Infrastructure (Road / Rail / Pylons etc.)	1	2	3	4	5
Leisure / Recreation Facilities	1	2	3	4	5
Other – Please specify	1	2	3	4	5

Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?

We fail to see how the Council can properly have considered certain aspects of the Local Plan without having the appropriate evidence, particularly with regard to:

Environmental Evidence

- Green Infrastructure Study
- Landscape Capacity Assessment
- Surface Water Management Plan for Brentwood Borough

Housing & Demographic Evidence

- Housing Viability Study

Transport Evidence

- Crossrail Economic Impacts

- Highways Modelling

Leisure & Facilities Evidence

- Open Space Study
- Sports Facilities Study

We also note that the Objectively Assessed Housing Needs for Brentwood Borough Study says in paragraph 6.1 that “The OAN starting point, following the Planning Practice Guidance is the latest set of household projections. However these are currently delayed.” It seems inappropriate to move ahead with the consultation without this important information. The document also says in paragraph 6.4 “Adoption of an OAN aligned with the 2012 projections (i.e. 330 dpa TBC) would represent a significant boost to housing delivery for the Borough. We conclude this because 330 dpa is more than triple the former local plan targets and around double the RSS targets. It is also far in excess of delivery seen in the past 10-15 years.” With regard to employment, the report goes on to say in paragraph 6.14 “NLP, in the updated economic futures report, tested the delivery of 362 dpa (OAN at the time of the 2013 Preferred Options consultation). They concluded it delivered more jobs than the ‘policy off’ Experian baseline.” In concluding, the projection is set in the report at 360 dpa. This figure from the explanations in the report is at the upper end of projections, does not align with prior experience and seems to be excessive as well as being based on figures the Council does not have. This is the key statistic in the consultation, which drives the need for change and yet is very subjective and not borne out by any prior experience. Hence the suggestion in the answer to question 3, that Brownfield sites should be used first so that the Council has further time to see what actual need is generated from local growth and Crossrail.

We consider that the strategy document does not consider environmental matters adequately with regard to Greenfield and Green Belt land. No consideration has yet been given to the environmental impact or loss of biodiversity. A full impact assessment should be carried out on each site before any development is undertaken. (We note that there are no definitions for Green Belt or Biodiversity in the Glossary in section 8.)

No consideration seems to have been given to the loss of a substantial amount of farming land should the proposals outlined in the plan go ahead. This is not mentioned at all in the consultation.

The issue of adequate parking in Brentwood and Shenfield (including station parking) does not seem to have been addressed.

Q13: What do you think the priorities for infrastructure spending should be?

We do not believe that this extent of expansion of the Borough should go ahead without significant resources being spent on roads, parking, schools and policing. Furthermore, if Greenfield and Green Belt land are going to be used then consideration needs to be given to green spaces and the provisions of additional parks and recreational facilities as well as designated conservation areas.