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Date : 16th February 2015

BRENTWOOD LOCAL DEVELOPMENT PLAN – STRATEGIC GROWTH OPTIONS CONSULTATION

Thurrock Borough Council has considered the consultation on the Brentwood Council Local Plan Strategic Growth Options and sets out below a formal response. In addition Thurrock Council has made representations on the Dunton Garden Suburb consultation which was undertaken in parallel and these representations have been submitted separately.

Introduction and Background

Brentwood Borough Council has previously consulted on Local Plan Preferred Options in 2013 which sought to protect the Green Belt and local character and focus new development during the period 2015-30 on land accessible within existing settlements. Other than a strategic Green Belt development site identified at West Horndon there were no other significant Green Belt boundary changes. The plan sought to provide 3,500 dwellings for the period of the plan with a higher provision of 5,600 dwellings rejected.

The Brentwood Preferred Options draft local plan strategy was based on strong local support for protection of the Green Belt and technical evidence that suggested there were significant capacity constraints with higher levels of growth having significant impacts on Green Belt, landscape, settlement character and identity, together with congestion and infrastructure capacity issues.

Thurrock Council strongly objected to the Brentwood Borough Council Preferred Option Local Plan and in particular provision in Policy S2 to accommodate only some of the identified objectively assessed need for housing within Brentwood. Thurrock Council also objected to the Brentwood Local Plan requiring neighbouring authorities to accommodate the remainder of the need. Thurrock Council has stated its concern that there was a lack of assessment of the potential benefits of Crossrail in promoting development in and around the settlements of Brentwood and Shenfield. Thurrock

Council also questioned why a formal Green Belt review had not been undertaken and the lack of publication of some of the evidence base to justify the assumptions, strategy and policies in the preferred options plan.

The approach undertaken in the Strategic Growth Options Consultation

It is noted the Brentwood Borough Local Plan Strategic Growth Option consultation sets out a proposed Vision, and Spatial Strategy options that propose a higher level of development than the previous draft Preferred Options Local Plan consultation. The proposed approach in the Strategic Growth Options seeks to accommodate a approximately 5500 additional dwellings and 49ha of employment land in Brentwood during the plan period.

Brentwood Council has made the proposed revisions to the draft local plan to take account of the requirements of the National Planning Policy Framework and National Planning Policy Guidance and as a response to representations received including additional sites suggested for development. In addition a strategic release of Green Belt land for development east of West Horndon and west of Basildon is suggested as concept to be investigated as a joint approach by Basildon and Brentwood Councils. Brentwood Council has also undertaken and published part of a range of revised and new technical evidence since the Preferred Options consultation of 2013.

Thurrock Borough Council acknowledges that the proposed changes included in the Strategic Growth Options consultation seeks to accommodate the higher growth levels derived from the objectively assessed need within the Brentwood Council boundary compared to the Preferred Options Local Plan of 2013. The revised strategy continues to advocate development focused on brownfield sites and town centres regeneration (2500 dwellings) but also proposes 3000 dwellings and minimum of 23 hectares of land for employment set out as a number of Broad Area options each containing sites identified as potential Green Belt releases.

Thurrock Council supports in principle the approach taken by Brentwood Council to accommodate the objectively assessed need within Brentwood's boundary, whilst recognising this is an ambitious growth agenda.

However Thurrock Council is concerned that Brentwood Council should further review the strategic development locations issues (see response set out below and in response to Dunton Garden Suburb) and evidence base including a revised Objectively Assessed Need. It is considered the local plan will require further revision and consultation with an ongoing duty to cooperate with adjoining local authorities.

Lack of up to date evidence base

Brentwood Council needs to ensure that the local plan strategy and policies are evidenced on sound economic and housing technical studies based on robust methodologies for identifying objectively assessed need. In addition relevant infrastructure requirements associated with each of the proposed broad growth areas should be identified and any environmental constraints and impacts of development taken into consideration.

Thurrock Council remains very concerned that considerable elements of the evidence base have not been made available during the consultation process even though some of these studies were identified as forthcoming at the Preferred Options stage

and despite comments made by respondents regarding this issue at this previous stage of consultation.

The main Growth Options consultation document itself identifies on page 6 the following evidence base documents as forthcoming:

- Green Infrastructure Plan;
- Landscape Capacity Assessment;
- Objectively Assessed Housing Need (OAN) for Brentwood Borough;
- Housing Viability Study;
- Crossrail Economic Impacts;
- Highways Modelling
- Open Space Study

It is considered the draft Brentwood Local Plan remains part based on assumptions that are not clearly evidenced or available for respondents to make full and informed comments to this current consultation. The OAN report was only published very late in the consultation period. Furthermore assumptions and assertions are made in the Interim SA report without the full baseline of supporting evidence available (see other comments). This is a major error in approach and in the consultation and Duty to cooperate process. The draft local plan and evidence when available should be subject to further consultation prior to the submission stage of the plan.

Technical Evidence requiring an update.

It is also suggested that some of the existing technical evidence base will require to be updated prior to the submission draft of the Local Plan. Brentwood Council has recently published a revised Strategic Housing Market Assessment (SHMA) in July 2014 and an updated Economic Futures Report in December 2014. Both reports relate to demographic forecasts and household projections based on EPOA Phase 6 study scenarios or earlier demographic information. The information in these reports relates to scenarios based upon the 2010 sub-national population projections and the 2011 Interim population and household projections. It is noted the Economic Futures Report also refers to an Objectively Assessed Need figure and earlier demographic scenarios.

The National Planning Policy Framework (NPPF) and National Planning Policy Guidance place great weight on using the most up to date population and household data. This year the government will be producing the 2012 set of household projections following on from the publication of the 2012 population forecasts. Both these sets of data are likely to be the first robust set of post census data and projections. Brentwood Council should consider the need to take these projections into account in any objectively need assessed scenarios for employment or housing upon which to base the strategy for development for Brentwood Borough.

An Objectively Assessed Need (OAN) figure of 362 dwellings a year (resulting in a total of approximately 5,500 dwellings for the plan period) is quoted in the current Strategic Growth Options consultation. This may or may not be an underestimate of dwellings required when compared to scenarios based on the new 2012 Population projections and soon to be published 2012-based household projections. It is considered the household numbers produced by the EPOA Phase 6 population and demographic report and the current analysis in the Brentwood SHMA of 2014 do not constitute the objectively assessed need. It is noted that the OAN report by

consultants recognises that further assessment will be required to take into account the pending 2012 household projections.

Brentwood Council will need to ensure that the objectively assessed need meets the requirements as set out in the NPPF, NPG and recent good practice guidance produced by the Planning Advisory Service. The new OAN figure should form the basis upon which to take the draft local plan strategy, policies and site allocation forward (and should be subject to further consultation).

It is acknowledged that the Growth Options report states that the dwelling requirement will need to include any shortfall from previous years. In revising the OAN figure any shortfall should be taken into account and is usually adjusted to align with to the baseline of key demographic data. The Local Plan should also provide sufficient dwelling provision (15 years) from the anticipated date of adoption. For the above reasons both the Objectively Assessed Need and dwelling requirement for the plan period are likely to be higher than the 5,500 dwellings stated in the Strategic Growth Options report.

It is unclear how Brentwood is going to take account of the new dwellings provision requirement to be met for households identified by DCLG/ONS projections for Brentwood into the OAN. At this stage therefore Brentwood Council does not demonstrate how it is accommodating the housing requirement for Brentwood.

A new revised SHMA has been published by Brentwood Council in July 2014. The SHMA relies on the EPOA phase 6 work including 2010 SNPP and 2011 interim population and household based projections which may now be less robust than the new 2012 based data. The SHMA also defines the housing market area for Brentwood as the borough based on evidence of a high level of self-containment.

Government guidance states that SHMA areas are unlikely to reflect borough boundaries unless a high level of containment is demonstrated. Whilst Thurrock is not part of the same SHMA area it is considered the evidence provided for self-containment of the Brentwood SHMA is questionable as it relies on data from a limited period of house moves in the sub-region which may distort the level of self-containment. Also population migration and household data demonstrate significant flows into Brentwood over short and longer periods from London. It is considered the SHMA market area should be reviewed to assess its robustness and spatial geography. The SHMA is also based on the now out of date 2007 SHMA guidance.

Both the recently published Brentwood SHMA and Economic Future reports will need updating to reflect the new objectively assessed need based on 2012 published demographic data. This will especially be the case if the OAN is significantly different from the current assumptions about the level of dwellings required for Brentwood Borough over the plan period

Green Belt Issues

Although Thurrock Council strongly supports the purpose and function of the Green Belt there is a strong objection made to Brentwood Council for the failure up to this stage to undertake a formal Green Belt review as part of the local plan process in either the Local Plan Strategic Growth options of 2015 or the previous Preferred Options consultation of 2013.

The National Planning Policy Framework makes provision for the review of Green Belt boundaries in order to meet other objectives of the framework and it is considered Brentwood should undertake such a review to accommodate its housing need. No compelling evidence has been presented at this stage as to why the Council should not undertake such a Green Belt review. Strong support for the Green Belt by the community in itself is not a strong enough argument for not undertaking a Green Belt review.

The Brentwood Preferred Option Local plan consultation of 2013 and the current Strategic Growth options consultation of 2015 both demonstrate that Brentwood can only accommodate some of the objectively assessed housing requirement on brownfield land and it is considered this represents the exceptional circumstance appropriate for Brentwood to undertake a Green Belt review.

Both documents contain proposals for strategic Green Belt releases without a formal and consistent review of the Green Belt having been undertaken. Within the Preferred Option Brentwood Council Local Plan there was a proposed strategic release Green Belt release at West Horndon of up to 1500 dwellings. The Strategic Growth Options document puts forward three broad area options to consider for development and suggested sites including Green Belt releases identified from the SHLAA call for sites and representations submitted on the Preferred Options. The Dunton Garden Suburb is identified as the only strategic Green belt release.

The current consultation document fails to consider a more strategic and consistent approach to assessing options for Green Belt release and boundary changes for the broad locations in the Brentwood borough. Instead it relies purely on sites submitted by developers. It is considered that Brentwood Council should undertake a formal Green Belt review as part of the spatial options testing which is subject to further public consultation before the Council progresses the local plan to submission stage.

Spatial Strategy and Growth Options overall

The preferred option stage of the Brentwood Local Plan had a spatial strategy that was based on a variation of the transport corridor option but with a strategic Green Belt release at West Horndon on the basis this location had the capacity to accommodate growth compared to other areas. The current Strategic Growth options consultation considers the borough in three broad areas for the purpose of considering the options for growth.

Thurrock Council has no objection to the three broad areas used for the purposes of the consultation but recognises that the spatial strategy that emerges is likely to include development options from the three areas and represent a further variation from the previous spatial strategy. It is challengeable therefore as to whether the previous spatial options represent the best or only options to accommodate the levels of development proposed.

Thurrock Council considers that the most appropriate spatial strategy would be a variation of the previous preferred options strategy (Option 2 on page 11) with growth including Green Belt release concentrated in the A12 Brentwood/Shenfield corridor but with some limited potential for Green Belt release at West Horndon.

Thurrock Council sets out below comments in relation to each of the broad areas identified in the Strategic Growth Options Report.

Broad Area (A) North of the Borough and housing site options

It is recognised that potential development options are limited in the broad area by its rural character and nature. Settlement expansion is constrained by limited transport and community infrastructure resulting in less sustainable forms of development.

However as stated in paragraph 3.14 of the document the potential offered by limited infill on brownfield sites should be investigated. Furthermore the capacity and re-use of previously developed land in the Green Belt for housing should be considered where appropriate and taking account of environmental and physical constraints. Sites should be appraised through the SHLAA and a criteria based policy included in the Local Plan should set out the circumstances and conditions when previously developed land can be redeveloped for housing.

Broad Area (B) – A12 Corridor and Housing Site Options.

Thurrock Council considers there is further significant potential to provide housing and other development in the A12 Corridor Broad Area including the potential for urban edge expansion of settlements. Thurrock Council does not wish to focus on site specific proposals but suggests some broad locations and key issues.

It is recognised that the western end of the A12 Broad Location is subject to a number of environmental constraints in addition to being within the Green Belt and is likely to have limited potential for development. However areas to the north, east and south east of Shenfield and Pilgrims Hatch and south of Hutton should be subject to further consideration for edge of settlement expansion as part of a Green Belt Review. These latter locations have less environmental constraints and sites are likely to have a lower sensitivity to impact on the landscape due to their proximity adjoining or close to the urban edge. A number of these locations also have boundaries that can provide a suitable new edge to the Green Belt for example the A12. It is considered due to the size and extent of the Green Belt in these locations that a limited number of urban expansions are less likely to have a significant harm to the openness of the Green Belt than locations in other broad areas.

The suggested locations have good existing transport services and community infrastructure and open space. The locations are also within reasonable distance of the railway stations.

Thurrock Council considers the role and potential economic and housing benefits of Crossrail in particular with regard to development at Shenfield have not been fully assessed and incorporated into the emerging Brentwood Local Plan either as part of the Brentwood Preferred options or the most recent Growth Options Strategy.

The NPPF states that in preparing their plans local authorities should support opportunities for growth. The housing and economic impact of Crossrail within Brentwood needs to be considered and assessed in detail. The improvements to the existing rail lines and increased frequency of services are likely to make Brentwood and Shenfield in particular a favourable location to live and work and stimulate economic growth.

The preferred options plan makes reference to a “Park and Walk” scheme but contains no specifics strategy or policies to direct and support growth at Shenfield.

It is considered the role and development of Brentwood and in particular Shenfield as a terminus of Crossrail should be thoroughly investigated and its potential role to accommodate further growth over the period of the local plan and beyond. The implications of the potential to accommodate more growth and associated infrastructure requirements need to be considered with some weight as a way of meeting the undersupply of housing requirement currently identified in the Brentwood Local Plan options and supporting evidence.

There is also an objection to the lack of a published detailed evidence base assessing the transport impacts of the various spatial strategy options and a detailed housing, economic and transport assessment of the impacts of Crossrail and with particular reference to Shenfield. It is understood that the technical assessment is being undertaken.

The recently published Road Investment Strategy and Autumn Statement of 2014 identify the Government committed to start the widening of the A12 (north of Chelmsford) and M25/A12 junction improvements. The widening of the A12 from the M25 to Chelmsford will follow in the next Road Period. These schemes represent an increase in road capacity and the opportunity to improve road junctions and accessibility to Brentwood and the A12 Broad Location Area generally during later period of the plan.

The A12 widening and delivery of Crossrail will bring about significant increased capacity and accessibility improvements to transport infrastructure for Brentwood in the A12 Broad Corridor during the later-part of the plan period. This will make the A12 Corridor broad area more suitable for development opportunities.

Broad Area (C) - A127 Corridor

Thurrock Council is fundamentally opposed to any large scale Strategic Green Belt releases either at Dunton Garden Suburb or West Horndon as options put forward in the Brentwood Local Plan consultations and the Dunton Garden Suburb consultation. The assumption that the A127 has greater potential for growth is questioned. Thurrock Council highlights the key concerns in relation to the A127 Corridor strategic corridor below.

Dunton Garden Suburb

Representations on the Dunton Garden Suburb proposal are made separately by Thurrock Council however reference is made below to the key concerns including:

- Significant impact and harm to the openness of the Green Belt;
- Coalescence of settlements;
- Detrimental impact on the Landscape;
- The lack of certainty regarding the deliverability of the development;
- Lack of detail on location and phasing of such a development;
- Lack of detail on the viability of such a proposal;
- Impact of the scale of development on adjoining housing markets and ability of Thurrock to deliver its housing;
- Infrastructure delivery and funding;
- Impact on strategic highway network - A127, A128, A13;
- Impact on the local highway network including within Thurrock;
- Lack of transport modelling and mitigation measure;
- Impact of possible LTX crossing route on land and infrastructure capacity;
- Concern over the deliverability of a railway station at Dunton;
- Assumption and scoring in the SA/SEA.

Green Belt Issues on the A127 Corridor

The strategic growth options document identifies there are several options for development of brownfield land and Green Belt release at West Horndon. It is considered that brownfield redevelopment and a limited Green Belt release north of West Horndon as indicated by sites (referenced site 37) represents a suitable scale of housing development in this location. It is noted that Brentwood Council had previously identified Green Belt release at West Horndon for up to 1000 dwellings (and 500 on PDL land in industrial estates).

Thurrock Council remains concerned about the lack of detail on location, delivery and phasing of such a development. It is considered that if these issues are not properly addressed then the development may not be delivered and exacerbate the lack of housing provision within the Brentwood Local Plan. Thurrock Council requests that more detail is provided as to how such a release is to be achieved and incorporated into a more formal Green Belt review process and Local Plan consultation.

However it is considered any larger strategic Green Belt release at Dunton Garden Suburb or West Horndon or in combination will have significant harm to the openness and function of the Metropolitan Green Belt. The Green Belt west and east of West Horndon meets the purposes of the Green Belt including preventing urban sprawl and coalescence between Basildon and West Horndon in the east and from West Horndon westwards to Cranham and Upminster in London.

The Dunton Garden Suburb would result in a significant Green Belt release leaving a limited gap between Basildon and West Horndon. Alternative proposals such as the smaller but still significant West Basildon Urban extension (PAD5) (up to 2,300 dwellings) together with significant Green Belt release east of the existing West Horndon urban boundary would also result in potential coalescence and urbanisation of the A127 corridor resulting in significant loss to the openness and strategic function of the Green Belt.

Other Green Belt releases including proposed land north of West Horndon and employment land (Brentwood Enterprise Park) at Junction 29 of the M25 with A127 taken together with a strategic release for housing at West Horndon will have an even greater cumulative impact on the openness of the Green Belt in this broad corridor.

Road Capacity and Impact

The A127 is at capacity and does not represent a better road transport alternative to the A12. Any larger development is going to require additional road infrastructure investment to improve access. There is limited public information currently available in order to consider highway capacity impacts at this stage.

The Government is currently giving further consideration to Options A and C for the future Lower Thames Crossing. This includes assessing a wider corridor for the route of Option C. Any assessment of development proposals at Dunton Garden Suburb or West Horndon will need to take account of the emergence of options for the Lower Thames Crossing and any possible northern route for Option C that extends along a M25/A127/A128 corridor.

A northern path for the route of option C could improve accessibility to the national network for development if links are provided to the A127 and A128. However

depending on the location of the preferred route it may have implications for development proposals in terms of land take south of the A127 and west of the A128 and could result in higher levels of noise and pollution.

Landscape Impact

Thurrock Council suggests that the potential impact of large scale developments on the A127 Corridor is more significant than stated by Brentwood Council.

The impact of development on the landscape depends on the size and scale of the development and the sensitivity of the landscape. It also depends on the level that any landscape character assessment is undertaken.

The A127 corridor sits within an important large fenland landscape character area, which extends across part of Brentwood, Havering and Thurrock authorities. The character assessments undertaken for Mid Essex including the Brentwood section do not reflect the importance of this open landscape. This fenland has been recognised by the Thames Chase Heritage Lottery Fund as a 'distinctive landscape character worth conservation' and has been identified by the CPRE as a nationally significant area of tranquillity in the metropolitan greenbelt.

The urban edges of Brentwood and Basildon are set back from the steeper slopes and screened with woodlands from views across the fenland. The settlements of Upminster and South Ockendon are identifiable in distant views to the east and south-east.

There are built features within the open fenland character which do not significantly impact the value of the area but may lower the quality or condition of smaller local character area and field by field character assessments. It is highly likely from the outcomes of landscape capacity studies that any development greater than discreet infill plots would significantly harm the landscape character.

The Brentwood section of the Mid Essex Landscape Character Assessment does not assess different scales of development. Furthermore the Mid Essex Landscape Character Assessment Sep 2006: Chris Blandford Associates Section 4 Character of Brentwood Borough description of open views to the south of Horndon Fenland, suggest the negative influence of "proximity of the area to a landscape which is more influenced by human activity around Thurrock and the Thames Gateway". This description does not properly reflect the character of the extensive fenland which is described in Thurrock Landscape Capacity: March 2005 Chris Blandford Associates as in having a "Rural character" and "Sense of tranquillity due to absence of major roads and built developed".

West Horndon Village retains a rural settlement character in the open landscape despite the relatively modern style of residential buildings and rural-urban fringe clutter that is disproportionate to the scale of the settlement. The east of the village, particularly the north-east, has a more intact and important rural landscape character. The larger fenland landscape character area would be affected by any further development. It is considered that development of the scale of the Dunton Garden Suburb or an extension east of West Horndon will significantly harm the open rural character of the broad fenland and the setting of rolling farmland and wooded hills of Thurrock.

Employment Provision

The Brentwood Plan and supporting evidence identifies the requirement for additional employment land. It is not always the case that employment land should be located at busy junctions or along the A127 corridor where it would add to traffic flows on a road at current capacity. Alternative locations and options should be investigated including the A12 corridor possibly as part of edge of settlement expansion and in mixed use schemes.

Interim SA Report

Thurrock Council considers the approach set out in the Interim Sustainability Appraisal (SA) is flawed and that a number of assumptions on the way that options have been scored is not supported by the available evidence.

The SA appraises and scores five options for the location of development with the assumption that most development would be located in one of the locations and usually as a strategic scale of development (Options 1 to 3). Whilst this may be useful as an initial approach it is considered that actual development may result in a hybrid of such options with development in several key locations but not necessarily the dispersed option or one strategic location. A hybrid option may well moderate the scoring and impact of development in these locations therefore giving more positive or negative scores rather than a large scale concentration of development.

A new option should be considered including development north and east south east of Brentwood/Shenfield or the Option 3 should be modified. Again this may result in different scores for the Central option. Another version of this option could also include a level development at another location such West Horndon. Such an option is likely to give different scores than presented in the report.

It is suggested that some of the scoring for the options in the SA has been based on assumptions that may not be correct or realistic and should be reconsidered.

- It is unclear why Option 1 would score so highly in relation to sustainable transport. There is a high level of uncertainty over the deliverability of a railway station for Dunton Option 1. The existing distances to railway stations are worse for Dunton compared to locations north and east of Shenfield.
- It is uncertain whether the benefits of improved accessibility brought about by Crossrail and longer term the A12 widening are taken into account.
- The landscape scoring for West Horndon is too positive as a large scale development would have a significant impact on the landscape.
- The scoring of the development options in relation to community and social infrastructure tends to overstate the benefits for new strategic developments without evidence being provided. Conversely the SA under-states the ability of existing locations to gain improved and additional capacity in infrastructure.

Summary

It is considered that Brentwood Council has not thoroughly tested all the available options to accommodate the housing requirement within Brentwood. The National Planning Policy Guidance and earlier advice from the Planning Advisory Service

recommend that local authorities should be required to thoroughly test all reasonable options before requiring other authorities to accommodate some of their need.

Thurrock Council at this stage does not consider that all reasonable options to accommodate Brentwood's dwelling requirement within Brentwood have been fully examined by the Council and tested in accordance with government policy and guidance. Therefore the approach to preparation of the local plan is unsound.

Thurrock Council requests that more detail is provided as to how such a Green Belt release is to be undertaken and review and how alternative locations have been considered before a further draft Local Plan consultation. It is considered the role and development of the A12 corridor and in particular Brentwood/Shenfield Broad Area should be thoroughly investigated and its potential role to accommodate further growth over the period of the local plan and beyond. The implications of the potential to accommodate more growth and associated infrastructure requirements need to be considered with some weight as a way of meeting the housing requirement currently identified in the Brentwood Local Plan Growth Options and supporting evidence.

Thurrock Council has a fundamental objection to a strategic Green Belt release at Dunton Garden Suburb or at West Horndon due to the impact on the Green Belt. In addition limited evidence has been made available to determine demonstrate the deliverability and viability of such schemes.

Thurrock Council has also highlighted various aspects of concern with the evidence base in connection with the preparation of the draft local Plan.

Thurrock Council wished to clarify that its objections to the earlier preferred Options stage are still stand. Due to the issues highlighted in this response and to the earlier document there are several fundamental concerns to the strategy approach and detail development proposals it is considered that Brentwood Council needs to carefully consider how it proceeds with the preparation of the Core Strategy Local Plan and the timetable for its production.

Thurrock Council request to be kept informed of the preparation and publication of the Brentwood Local Plan and technical evidence base as part of the Duty to cooperate process.

If you have any questions or seek any clarification on the matters raised do not hesitate to contact me.

Yours sincerely



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