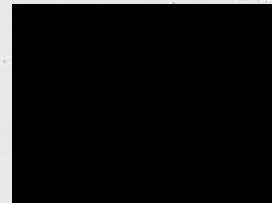


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Planning Policy Team  
Brentwood Borough Council  
Town Hall  
Brentwood  
Essex CM15 8AY



6<sup>th</sup> February 2015

**BRENTWOOD BOROUGH COUNCIL  
STRATEGIC GROWTH OPTIONS CONSULTATION**

Dear Sirs

I write in respect of your **STRATEGIC GROWTH OPTIONS CONSULTATION**

A general comment is that the document needs to be much more evidence based and even handed. There is a bias running through the document resulting in a leading towards development the south of the Borough. I cannot cite all of these, but as examples: the obvious and severe traffic existing problems on the A127 are not stated in the discussion, with development being seen as a possible solution to an inferred need, (3.12) whereas such growth in the A12 corridor 'could have similar negative impacts on infrastructure and services' (3.13) and in the even more so in (2.10) where development in the Brentwood urban area and north of the Borough creates problems whereas in the A127 corridor and West Horndon development creates opportunities.

To prevent such a bias developing the whole consultation needs to be supported by an objective presentation of localities under 'stress' and the costs (both financial and environmental) to deal with these.

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

No for the following reasons:

It is arguable whether the Borough needs subdividing at all for growth purposes and the approach to growth needs to be based primarily around Green Belt considerations. I believe that to accommodate growth all steps possible should be taken to limit the release of Green Belt and that this course of action should only be followed in extenuating circumstances where there is no other realistic possibility.

Other models for growth should be considered and I believe that to accommodate growth all steps should be taken to minimise the release of Green Belt. Means of doing this include:

- maximising the use of derelict or underused urban space
- increasing densities within already built up areas
- developing brownfield areas both within urban and rural localities

Should any release of greenfield land be absolutely essential these should be considered through

- release of infill sites
- release of many smaller sites on the edge of urban areas
- application of suitably high densities to any greenfield land released.

Further comments on the broad divisions are:

In the absence of evidence relating to transport I think it unlikely that this is the only or most important matter on which to base decisions. Even in the most rural parts of the Borough transport is not particularly poor compared with many parts of Essex let alone the country. The subdivision is based ostensibly on transport but the north / middle / south land subdivisions is just too coarse a reflection of transport availability, this being predominantly linear in nature.

Even accepting transport led subdivisions in principle, this quickly needs to be refined by considering the questions of available capacity and financial and environmental cost to upgrade to accommodate growth. Without these considerations the basis of the study is unsupported.

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

Partially although the brief analyses 2.14 – 2.19 should be consistent. 2.19 is particularly biased whereby it makes an unsupported link between the character and availability of land for growth being potentially greater (surely this is the ultimate conclusion of considering all aspects of land use) and that the A127 has more scope for improvements than the A12 (and I would add, the A128, B roads and local road network).

To reiterate the point under Q1 if transport really is the key issue then a link is required between problems and solutions before judgements can be suggested.

Issues for the three areas should also concentrate on environmental impacts of the various options.

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

I believe that principles regarding the release of Green Belt should be foremost and in principle all steps should be taken to minimise such release. I agree with the aim to maximise the use of brownfield areas both within urban and rural localities. I also feel that release of Green Belt could be further minimised by appropriately increasing the density of existing settlements.

Even taking this into account should additional sites be required these should generally be of an infill nature or otherwise to create compact communities. This should apply to both urban and rural areas in order to create built up areas that minimise impact on landscape and facilitate the creation of a focus. The extent to which this principle should be applied would be based on minimising impact vs growth.

In terms of the sites illustrated:

3.12 – The completely new town 'Dunton Garden Suburb' would in my view have disproportionate impacts on the Green Belt in addition to creating a new urban centre which I feel would be detrimental to Brentwood Town centre and the road network. In addition the growth suggested here for West Horndon is clearly disproportionate to my suggested aims of

minimising release of Green Belt land. Some very limited growth to West Horndon though could be accommodated whilst keeping the existing community compact and focused.

3.13 – In general both these options should be pursued within the aims I mention above. I would oppose the large scale areas shown south east of Hutton as per my comments on the 'Dunton Garden Suburb'. Further linear expansion at Brook Street termed 'Development options at M25' and are also highly detrimental to the Green Belt by eroding this already narrow strip between Brentwood and urban Havering, and that at Coombe Woods, Bereden Lane would be a planning travesty. Some smaller growth opportunities to Pilgrims Hatch, Shenfield and Honeypot Lane would perhaps have the least affect on the Green Belt and be close enough to existing built up areas to keep the built up area as compact as possible and focus activity towards existing urban centres. Small extensions to Mountnessing and Ingatestone that are within the confines of the existing road / rail corridor could also be considered.

The idea of an additional junction with the A12 to intercept the A128 is so obvious that I'm surprised that this wasn't incorporated back in the 1960s. It is this sort of link to the interrelationship between growth and transport that I was referring above although in this case it would have a significant added benefit to the community rather than just accommodating additional pressure created by growth.

3.14 – Isolated sites should not in general not be considered for housing development such as Clapgate Estate and Thoby Priory. Some smaller growth to each of the main communities shown on the plan (except Navestock) could be accommodated whilst keeping the existing community compact and focused.

**Q4: Given the greater capacity for growth along the A127 Corridor, which of the sites put forward do you think is the best location for growth?**

This is a strange leading statement as the assumption regarding greater capacity for growth along the A127 Corridor remains undemonstrated. On the face of it the same phrase could be used to open a question about any other part of the Borough. For example if necessary local road improvements could be considered for the north Brentwood area (including an additional junction at the A12 / A128, and similarly in the area of the 'five villages' in the northern subdivision.

As discussed above in relation to the A127 Corridor very limited growth at West Horndon is the only reasonable option for this sub area.

**Q5: Should the A12 Corridor accommodate growth by releasing sites on the edge of urban areas?**

The same general comment applies in that if so this needs to be based on environmental impacts in addition to a more thorough examination of local constraints and the costs / benefits of satisfactorily resolving these. On the face of it though the five main urban areas in this subdivision are likely to offer the most from release of greenfield land because there is

- a greater perimeter to the built up area and urban and semi urban landscape
- a number of existing town facilities,
- a closer proximity of brownfield land and areas requiring regeneration in these areas
- a greater chance that investment from growth will go into Brentwood Borough
- In addition transport links this broad area are good.

**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)?**

It is in general much more preferable for brownfield sites to be developed over greenfield sites however the impacts and implications of this do need to be taken into consideration. In some cases brownfield sites are best left in employment use and /or are not in a town or village context and in such cases creation of new housing in the countryside should be avoided.

**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?**

I think the link between employment use and the strategic highway network is likely to be sweeping and in cases the opposite is true. Certain employment uses can be advantageous in creating a positive mixture of land uses and communities. However as stated in the text some employment uses create a number of adverse impacts on communities. I do not think good strategic highway network *per se* is so important for many employment uses nor for 'modern business needs' however it may be that such a pattern develops by consequence of considering other aspects of planning. I would say that future employment need should be met by considering the full range of planning matters including impacts on the landscape and the green environment.

**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?**

Definitely. Retail lends itself well to densification of existing land use and I do not feel that release of any, or extremely limited amount of Green Belt should be necessary to accommodate such growth.

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

Not so much provision of open space as the need for better recreational linkages and other improvements relating to access and the quality of open spaces.

It would be helpful if the Council were more proactive in terms of the environment and, for example, provided public transport to the parks such as South Weald and Thorndon, or at least provide free parking for the first 2 hours. It is important to replace trees on the edges of roads etc to keep Brentwood feeling rural and not urban. To this end it is important to avoid advertising creep on business premises. I think it is important to not have neon signs for e.g. the Holiday Inn and other businesses.

The A127 represents a severe block to north - south recreational routes. Effectively there is no sympathetic crossing for the 6.5km from Great Warley Road to Dunton outside of the Borough. This is a very regrettable matter as it limits the value of Thorndon Park to residents of West Horndon and any recreational users coming from the south to the Park.

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

**Q11: To what extent do you think the following is present in the landscape near where you live:**

I think it misleading to ask for a comparison between other areas in Brentwood Borough in Q10. The real aim should be to discover what impacts release of any Greenfield land would have. Intrinsic value of the landscape being considered for development is one of these, but the impacts would be a combination of both the nature of the proposed developments (including indirect effects) and aspects related to wider values relating to those areas impacted. The first part needs at least some definition. The second part needs to be judged not just on the parameters listed but also on other factors such as:

Views – this being more about the vistas that can be gained of and from the area under consideration

Value in providing 'green lungs' to surrounding developed areas

Value in providing green continuity for the purposes of nature conservation recreation

Ability to be viewed and used

To take an example, an urban park may score v low on most of the aspects of question 10 but would suggest that the impacts of developing this space could be huge. My views on impact on landscape are largely answered under question 3.

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

I'm not sure that green infrastructure covers the point I wish to make as green infrastructure sounds like a local provision to create a desirable community. The main issue for me surrounds the pattern of any release of Green Belt land to accommodate growth. I firmly believe that even if growth on one or two large scale land releases could be accommodated this model would seriously make Brentwood a poorer Borough compared with a more dispersed growth model. This is because the 'pain' of smaller Green Belt losses can be more easily absorbed and the gain more directly and perhaps fairly directed to the relevant community. With a few large scale developments the 'pain' of growth simply has to be swallowed – no one can ignore the detriment to the Green Belt that would be created by developments the size of that at West Horndon and the Dunton Garden Suburb but the gain is likely to be only too readily swallowed up in dealing with the obvious capacity issues that would be created by such a concentration of living and associated activity.

To restate, a more dispersed growth model can be used to efficiently use existing infrastructure capacity possibly with little intervention whereas large developments will inevitably require greater use of investment into the Borough in solving problems created by the development.

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

This requires a study in itself and I note that this is being looked in to (6.3). As stated throughout this response though I feel that Strategic Growth options need to come out of the conclusions from the Infrastructure study (and studies into other such high level matters) rather than being in response to a more arbitrarily suggested steer.

Yours Faithfully



Ian Blackburn